

Evaluating the effectiveness of Planning Performance Agreements in involving communities in the orchestration of complex development proposals.

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Evaluating the effectiveness of Planning Performance Agreements in involving communities in the orchestration of complex development proposals.

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List of Abbreviations

Although subsequent terms are defined more fully within the substance of this work, a list of abbreviations is useful for reference:

ATLAS- Advisory Team for Large Applications

BVPI- 'Best-Value Planning Indicator'

CLG- Communities and Local Government

LDF- Local Development Framework

PAS- Planning Advisory Service

PDA- Planning Delivery Agreement

PPA- Planning Performance Agreement

PPS- Planning Policy Statement

RSL- Registered Social Landlord

RSS- Regional Spatial Strategy

RTPI- Royal Town Planning Institute

SCI- Statement of Community Involvement

TCPA- Town and Country Planning Association

Abstract

Evaluating PPAs - flexible policy mechanisms designed to facilitate greater pre-planning application interaction between developer and Local Authority in relation to complex developments- in terms of their procedural efficacy in involving communities and in light of contemporary factors impacting upon the planning system establishes that PPAs possess potential for improving the nature of public participation in orchestrating developments whilst nonetheless operating firmly within the context of the U.K. planning system, which itself poses more significant obstacles for achieving effective community involvement- notably resource scarcity. Whereas interviews with PPA policy-makers represented the process in a similarly positive light as the aspirations of policy documents, re-examining responses to the Government-run PPA consultation- and even more so the practical experience of two case-studies of PPAs in practice- challenges existing, predominantly positive, analyses of PPAs through illustrating how negative perceptions of developer and Authority collusion can arise, and how practical PPA implementation has on occasions failed to realise idealised policy rhetoric. Situating PPAs in their rightful context at the centre of Government growth-orientated agendas, changes in the planning system, and in turn with regard to factors impacting upon the planning system itself, research revealed that PPAs respond to deeply-rooted rather than short-term causes, are relatively apolitical in essence, and owing to their level of support from developers and Local Authorities alike will remain tenacious in the face of changing market conditions. Ultimately, unpicking the complex dynamics of PPAs, community involvement, and the planning system at large returned the project to its initial catalyst- the popularly perceived lack of community involvement in Government 'eco-town' policy. Given irreparable damage to public opinion has not yet occurred, and as PPAs offer qualified potential to improve the nature of community involvement in the orchestration of significant developments, provided the process is sufficiently sensitively publicised, the PPA approach might tentatively be applied to eco-towns to positive effect.

1. Introduction

The much publicised lack of public consultation in relation to the Government's current 'eco-towns' programme- the creation of new developments between 5,000 and 10,000 homes, exemplary in environmental standards, and 'separate and distinct' from existing towns (CLG, 2007a: 12)- presents a timely opportunity to re-evaluate current mechanisms for involving communities in complex large-scale developments (e.g. RTPI, 2008). In response, this study isolates Planning Performance Agreements (PPAs), formally introduced into the UK planning system on 6 April 2008, as the most relevant existing policy framework for orchestrating the initial stages of similarly significant developments as eco-towns (CLG, 2008a). Although already subject to numerous evaluations, the effectiveness of PPAs in relation to community involvement has received scarce attention: it is the only element of the Planning Advisory Service (PAS) run PPA pilot project that was not determined to be unequivocally positive (PAS, 2007: 2). This study therefore undertakes a critical evaluation of PPAs in terms of achieving effective community involvement in the formulation of large-scale developments, which will both be framed by, and in turn inductively reflect upon, the planning system more broadly.

Subsequent to a justification of why community involvement in the orchestration of complex large-scale developments is of considerable contemporary significance alongside an extensive theoretical background, this work devises and undertakes a research itinerary for refreshing, broadening, and deepening existing evaluations of PPAs, with the ultimate aim of assessing the utility of the PPA approach to redress the existing perception that eco-town proposals have paid scant regard to public opinion. All three research phases- interviews with those involved in the creation and monitoring of PPAs, re-examining responses to Communities and Local Government's (CLG's) PPA consultation exercise, and divergent case studies of PPA implementation in Lancaster and Lambeth- indicate a similar theme: although in idealised policy statements PPAs may be beneficial for improving the scale and scope of community involvement in the formative stages of significant development proposals, issues of third-party perception of Local Authority and developer collusion, systemic resource scarcity, and inertia of established planning practice are potentially inhibiting factors that are largely omitted from existing PPA analyses. This work therefore ultimately concludes that applying PPA processes to redress the popularly-perceived lack of community engagement with the eco-town programme, given that irreparable damage to public opinion has not already been incurred and with the caveat that this issue requires considerable additional attention, would be beneficial provided PPAs are sufficiently transparent, well-publicised, and resourced. The structure

of this introduction serves for that of the entire project: context-setting, theoretical background, research design and execution, conclusions, and ultimately a critical evaluation of the project itself.

1.1. Rationale

Planning Performance Agreements are an increasingly widely-used policy mechanism for orchestrating the formative stages of large-scale or particularly complex development proposals, and are therefore central to current growth-led Government agendas-notably eco-towns, debates on community involvement in the planning system, and thoroughly intertwined with market conditions:

The 'off-plan' emergence of eco-towns could exacerbate community opposition, particularly if communities are being involved relatively late in the decision making process.

(RTPI, 2008)

It is widely accepted that community participation is a key ingredient in the delivery of planning outcomes... it can assist in the identification of local needs and problems, inform policy-making, and provide feedback on service delivery while at the same time fostering a sense of local ownership and civic pride. However, in practice, effective community involvement in the planning process is often neglected and the benefits remain unrealised.

(TCPA, 2008: 2)

I am pleased to be here today to promote Planning Performance Agreements... [via which] developers and local authorities can work together to find real solutions to complex planning issues whilst engaging the community who, importantly... have their own views on how their environment and homes should be improved.

(Parliamentary Under-Secretary of State, Ian Wright MP, 4 June 2008)

Yet none of these statements can be uncritically accepted, least of all Ian Wright MP's assertion that PPAs offer a successful framework for harmonising different interests in the development process, as it is inevitably influenced by a political perspective. The complex issues behind eco-towns, PPAs, community involvement in planning, and the context in which planning operates more generally therefore necessitate careful critical evaluation- the substance of *Section 2. Theoretical background*.

1.2. Aims

The overall aim of this work is therefore to investigate whether, in the context of contemporary issues faced by the planning system, PPAs are effective mechanisms for improving community involvement in the developmental process above that which is already undertaken, and that might beneficially be applied to delivering eco-towns. Focusing specifically on evaluating PPAs- the existing policy mechanisms that bears closest resemblance to the situation that will be encountered in the practical orchestration of eco-towns- will inductively reflect upon the planning system itself, and broader issues still that in turn impact upon the planning system:

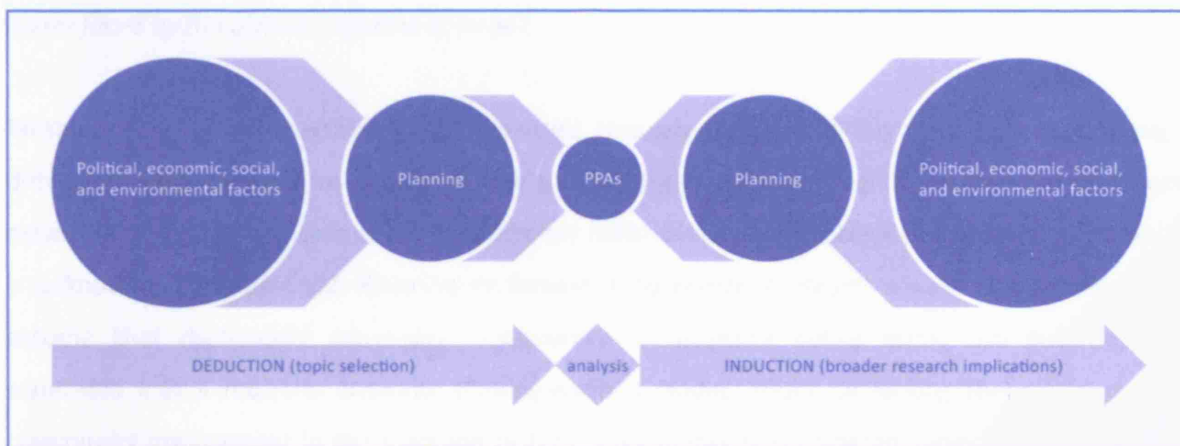


Figure 1. Diagrammatical representation of research theory (all diagrams, unless otherwise indicated, are original).

This work's research aims can therefore be crystallised into three statements:

- A. to evaluate the effectiveness of PPAs in regards their procedures for involving communities from both a 'policy' and 'implementation' perspective;
- B. to evaluate how changes in the planning system, market forces, and political imperatives impact upon PPAs;
- C. to establish whether the PPA approach is both technically applicable, and beneficial in practical terms, to the eco-towns programme.

1.3. Research objectives

Whereas so far it has been established that the remit of this work bears significance beyond its ostensibly selective policy limits and overarching research aims have been outlined, this section will sub-divide overarching aims into five research objectives. Within these research objectives, a methodology for their realisation will be outlined, key emergent themes briefly considered, and a note made of how each objective fits into the structure of this work.

Objective 1- what is the contextual and theoretical background to four central project issues: PPAs, eco-town policy, community involvement in the planning system, and the nature of contemporary issues faced by the planning system at large?

Methodologically, this section will be realised through desk-based literature review. Although difficult to distil themes from such diverse topics, in general terms significant relevant literature exists, but in each instance is either insufficiently holistic- the prevalence of PPA usage, for example, is unknown (see *Section 2.2. Planning Performance Agreements*), dated- it would be erroneous to assume that rhetorically privileging 'community' in planning policy terms has automatically translated into a requisite outcome (Cullingworth & Nadin, 2006), or lacking theoretical depth- community involvement in the planning system is a commonly considered subject, but one which always fails to consider deeper conceptual issues such as the meaning of the term 'community' itself (e.g. Delantray, 2003). This objective forms the basis of *Section 2. Theoretical background*.

Objective 2- what research methodology can be established, informed by the theoretical background established in undertaking 'Objective 1', which contributes to realising all three research aims defined in Section 1.2. Aims?

Formulating a research itinerary will be achieved through an appraisal of the practical success of existing methodologies used in similar research endeavours- impersonal surveys in particular emerge as a poor method of returning quality responses (TCPA, 2008), and based on theoretical shortcomings of existing analyses- most clearly the absence of integration between 'policy' perspectives and that of 'the infinitely less glamorous world of implementation' (Peck & Ward, 2002: 6). For these reasons, the methodology arrived at is three-fold: interviews with those involved in the creation and revision of PPA policy, re-examining replies to the CLG-run PPA public consultation, and focusing on community involvement in two divergent PPA case-studies. This methodology therefore accounts for considerable qualitative depth of research, quantitative breadth of PPA perception

largely from an ‘implementation’ perspective, alongside site-specific community involvement case-studies, where throughout the attempt is to reconcile the specific operation of PPAs to broader issues in planning, and in turn larger issues still impacting upon the system. This objective forms the basis of *Section 3. Research design*.

Objective 3- How can analysis generated through undertaking the methodology established in Objective 2 be best presented so as to represent both the degree of methodological realisation, and the relationship of analyses to overarching project research aims?

Methodologically this objective is the realisation of the research agenda established in *Section 3. Research Design*, and as such encompasses a number of ‘methodologies’ from qualitative interviews to quantitative survey analysis. As this objective is essentially the presentation of analysis incurred in the undertaking of this project’s research agenda, condensing the core conclusions thereof into a brief overview oversimplifies the complexity of emergent themes as more fully considered in *Section 5. Conclusions*. Nonetheless, all phases tended to suggest that to some degree PPAs did involve communities earlier and to a more profound degree than would have been achieved under statutory obligation placed upon Local Planning Authorities alone. It was frequently noted, however, that increased pre-application interaction between developer and Planning Authority might be publicly perceived as collusion to deliver developments, and therefore potentially poses a significant obstacle for the process in terms of ‘better’ community involvement. Equally, all research phases tended to suggest that PPAs are a relatively apolitical and flexible project-management tool that would list little in changing political and market tides. As to research aim ‘C’- research suggests that although technically applicable and possessing some benefits for community involvement in planning, eco-towns potentially present a considerable step-up in terms of the complexity of development that could be dealt with via the PPA approach. This objective forms the basis of *Section 4. Analyses*.

Objective 4- how has research conducted in the course of this project refreshed, broadened, and deepened existing evaluations of PPAs specifically with regards the project’s three overarching research aims?

Methodologically, this section is a consolidated reflection on emergent research themes, and an examination of the different results returned from various research phases. Essentially, realising this research objective is a succinct resume of ‘*Objective 3*’ that more clearly relates conclusions to the work’s central research aims. In doing so, ‘*Objective 4*’ isolates numerous tensions that exist

between the research phases- most notably that from an abstract policy perspective PPAs appear beneficial for improving community involvement in planning, whereas the reality from implementation experience appears far less conclusively positive. Provided PPAs are sufficiently transparent, well-publicised, and resourced- issues brought to light only through inserting PPAs into a broader context than attempted in existing analyses- they offer a beneficial and long-sighted mechanism for better integrating community views into the orchestration of large-scale developments. As noted in *Objective 3*, however, the relationship of PPAs to eco-towns, although technically highly plausible, in actuality is a far more complex issue that, although actively considered in policy-maker circles (e.g. P3), requires considerable further investigation. This objective forms the basis of *Sections 5.1. to 5.3.*

Objective 5-what does a self-referential evaluation of this work reveal as to revisions or avenues of further research required?

Methodologically this element essentially holds the project up against a theoretically conclusive yardstick as described in numerous instances (e.g. Silverman, 2005; Walliman, 2004), and critically evaluates shortcomings not only in the realisation of this work, but also whether in the course of study the very premise itself requires modification. Although this project largely succeeds in achieving the methodological structure designed for it- as fully explained in *Section 3. Research Design*- there are certain elements which would have benefitted from further attention, most notably more case-studies would have been able to incorporate a broader range of practical experience. In the course of conducting this project it also emerged that a greater focus on conceptual underpinnings- such as the concept of community involvement in planning, or indeed the meaning of the word 'community' itself- would have been beneficial as this would have placed questions of what motivates planning (i.e. the 'why' of planning) on an equal footing to planning process (i.e. the 'how' of planning). This objective is dealt with in *Section 5.4. Self-referential evaluation.*

2. Theoretical background

Embarking on research without a thorough theoretical backing would be futile. Based primarily on desk-based research of secondary-sources, this section will define, contextualise, and highlight conceptual issues relevant to PPAs, eco-towns, community involvement in planning, and contemporary issues faced by the UK planning system itself. *Section 3. Research design* will, in response to this work's three overarching research aims and in light of the theoretical and contextual background presented in this section, outline a research methodology for refreshing, broadening, and deepening existing investigation to the effectiveness of PPAs in relation to community involvement and their potential applicability to the eco-towns programme.

2.1. Planning Performance Agreements

PPAs were first suggested under the name of 'Delivery Contracts' in the 2001 Planning Green Paper as a mechanism to provide greater certainty as to the speed and quality of large-scale planning application and assessment procedures by facilitating more structured interaction between developers and Local Authorities in the pre-application stages of a proposal, and by exempting such arrangements from Government-imposed determination timescales (ODPM, 2001: 8). In 2005, the concept was revived, rebranded as 'Planning Delivery Agreements' (PDAs) and piloted in a project run by PAS and ATLAS. Twenty-two Local Authorities and Developers participated in the pilot, and ultimately overwhelmingly supported the concept (PAS, 2007: 2). Following a number of revisions to PDAs- prominent amongst them a name change to Planning Performance Agreement as 'Delivery' implied that the process automatically resulted in a positive planning determination- PPAs were proposed in the Planning White Paper (CLG, 2007b), and consequently offered up for public consultation. Consultation responses were overwhelmingly supportive of the project-management ethos of PPAs, although managing engagement with statutory consultees and adverse public perception of the process as collusion between developer and Local Authority were highlighted as insufficiently considered factors (CLG, 2007c). PPAs were formally introduced to the planning system on 6 April 2008 alongside a raft of guidance implementation notes (ATLAS, 2007). Although no current figures exist for the prevalence of PPA usage, anecdotal evidence from the work undertaken by ATLAS in disseminating PPA practice tentatively suggests PPA usage is increasing (ATLAS, 2008a).

In more concrete terms as to their practical operation, ATLAS guidance (2007) suggests that four essential elements should be established at a third-party chaired inception day, forming the backbone of the PPA pre-application process:

- project vision (including development objectives for the proposal);
- project issues and tasks plan (i.e. what needs to be done to bring forward an effective proposal that fulfils the Local Authority's requirements?);
- project team and decision-making framework definitions;
- project programme (procedural timetable)

More specifically still, in relation to community involvement, PPA policy suggests that 'developing and agreeing the project vision and a set of objectives with the community may be a critical early task' (ATLAS, 2007: 7). Indeed, as planning is taking on an increasingly 'place shaping' (Lyons, 2004), or 'communicative' as opposed to 'administrative' role (Zonneveld & Waterhout, 2005: 25), the process of establishing a vision for a proposal is an important endeavour for community involvement in itself. Improving community involvement appears to be a core motivation behind PPAs: exemption from Government-imposed determination timetables theoretically allows for greater scope of public involvement, greater clarity is initially established as to what is actually required from the developer in the form of community involvement, and deep public involvement exercises such as 'planning for real' (Goss, 2001: 39) or 'enquiry by design' (TCPA: 2007: 15)- both intensive sessions to promote engagement with groups beyond those which might typically be employed- are strongly advocated (e.g. ATLAS, 2007: 13).

As noted in *Section 1.1. overview*, however, community involvement in the PPA process is the issue least considered by existing analyses- the issue over which greatest contention as to the benefits of the policy on the ground exist (PAS, 2007: 2). This project must therefore span the gap between policy and practice, perception and actuality, in considering whether practically PPAs live up to their positive aspirations for community involvement.

2.2. Eco-towns programme

Eco-towns- planned new settlements of a magnitude unprecedented since the creation of 'New Towns', seeking to be exemplary in environmental terms- emerged in July 2007 as a means of combating both contemporary issues of housing supply shortfall and climate change (CLG, 2008b). CLG is currently assessing public consultation responses to the programme, and determining which

of fifteen potential sites will ultimately be selected (Ibid.). Invariably planning actions are met with some degree of opposition by virtue of the inevitably contested nature of the development process (e.g. Goss, 2001), yet the emergence and development of the 'eco-town' concept, however, has attracted considerable adverse media reaction, chiefly as it has largely by-passed the existing spatial planning system, and therefore also the intricate system of policy statements that by statutory obligation must encompass considerable community involvement. In advocating the creation of 'separate and distinct' (CLG, 2007a: 12) settlements, for example, eco-towns policy contradicts the focus on 'city-regions'- the targeting of investment towards existing agglomeration- that forms the core approach of the recently-adopted North-East Regional Spatial Strategy (GONE, 2008: 23). Public responses to the Communities and Local Government consultation process equally reveal that lack of community involvement in developing eco-towns has engendered much popular distrust: 'the first-round bidding process and its evaluation have been unnecessarily secretive. What a contrast with guidance in PPS 11 and 12, in which the need for early public consultation with communities and stakeholders is emphasised' (Community and Regional Planning Services, 2008).

In technical terms eco-towns closely resemble the types of development that PPAs were originally established to encompass:

- larger sites including a variety of land uses;
- proposals that are unique to a Local Authority's Experience;
- and especially, 'proposals which would have significant impact on existing communities and therefore require expensive consultation or involvement for many different stakeholders, interest groups, statutory agents etc.'

(ATLAS, 2007: 3)

It is therefore the endeavour of this work to assess rather than *could* PPAs be applied to eco-towns, *should* they be applied- based on an evaluation of their effectiveness in relation to community involvement- to redress the popular perception of lack of public involvement in the programme incurred so far.

2.3. Community involvement in planning

In direct contrast to the much-publicised lack of community involvement in the emergence of the eco-town concept so far, however, at least theoretically working in the interests of 'communities'

has never been accorded such high priority: 'a convergence of wills of planners and politicians ... has created a momentum for change which recognises planning to be at the heart of the future well being of our society' (Goodstadt, 2003: 2). Nonetheless, 'many questions remain about the effectiveness of public participation [in planning], whose interests are served by planning, and the relationship between professional and political decisions' (Cullingworth & Nadin, 2006: 431).

An extensive historical-perspective on community involvement in planning is largely tangential to the specific remit of this work; it is therefore adequate to note that dissatisfaction with the lack of public engagement with the planning system was a key motivating factor for reforms brought forward in the Planning and Compulsory Purchase Act 2004, and which put community involvement and 'sustainable development' at the forefront of the 'spatial' planning system (CLG, 2005). At national and European levels it appears public input into the planning process is largely limited, although such high-level policy is overwhelmingly enabling and advisory as opposed to specifically directive (Cullingworth & Nadin, 2006). Conversely, community participation should be 'continuous' and 'proactive' at both Regional Spatial Strategy (RSS) and Local Development Framework (LDF) levels (CLG, 2004: 12). As such, national and international planning policy establishment is undertaken chiefly through a process of 'representative democracy', regional and, to an even greater extent local, planning predominantly through 'participative democracy'- a perennial tension within the planning system (Rydin, 1999).

Government policy has clearly taken account of the multitude of voices pushing for greater community involvement in the system (e.g. Healy, 1997), by adopting the maxims that effective community involvement is front loaded, undertaken through employing methods appropriate to participants, transparent in operation, and a continual process with opportunities for feedback (ODPM, 2004). A plethora of processes, initiatives, and statutory obligations have been placed upon Local Authorities to ensure public opinion is at the forefront of local planning policy: Sustainable Community Strategies outlining the vision for an area's long-term sustainable social development (Cullingworth & Nadin, 2006: 227), Statements of Community Involvement that form the very basis of Local Development Frameworks (e.g. Morris, 2006), and Local Strategic Partnerships charged with developing cross-sectoral strategies to affect local change (ODPM, 2005). Many reviews of these instruments have simply found that it is too early to concretely tell either how they practically inter-relate (e.g. Deloitte, 2007: 8), or indeed their overall effect (e.g. Entec, 2003).

Yet, although in policy terms 'communities' are increasingly privileged in the planning process, the paradox exists that 'the challenge to build the urban renaissance is strongest precisely where

strategic capacity [i.e. the presence of strong communities] is often weakest' (Holden & Iveson, 2001: 63). Indeed 'community' itself is a mutable term that is often employed to suggest spatial pockets of deprivation: 'here 'community' is highly spatialized and has to be helped by the mainstream society' (Delantry, 2003: 3-4). Theoretically as well as operationally community is a highly contentious term, largely undefined in government policy, and certainly entailing different meanings for different people (Goss, 2001: 44; Healy, 2007). To assume, as government policy does, that the public wants the kind of communities policy envisages arguably in itself perpetuates the recurrent criticism of planning- that it acts with the 'public interest ideology' over 'the ideology of public participation' (Cullingworth & Nadin, 2006: 443).

2.4. Contemporary issues faced by planning

Too often evaluations of UK spatial planning processes take insufficient account of exterior factors that influence the system itself: 'debates are focused on the wrong questions, too many are concerned with the *how* of planning policy rather than the *why*' (Cullingworth & Nadin, 2006: 12). Owing chiefly, but not exclusively, to changes in political ideology and operation, the planning system has itself recently changed from a narrow focus on land-use designation to a cross-sectoral, cross-hierarchical, cross-geographical, 'spatial' system that aims to positively contribute towards society's sustainable well-being (e.g. ODPM, 2001: 12):

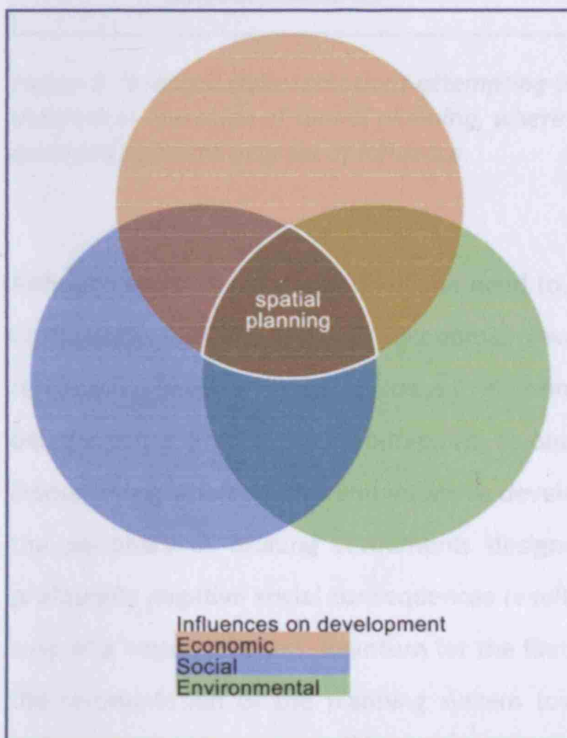


Figure 2. Commonly-used graphic to represent the theoretical rationale underpinning spatial planning, (e.g. CEC, 1999: 14).

Yet economic, social, and environmental influences on the planning system are unequal- in an era increasingly characterised by the 'unruly and self-propelled character of world affairs' (Bauman, 1998: 59), economic imperatives appear to predominate (Jensen & Richardson, 2004: 221). Whereas planning initially emerged as a counterweight to the inherent spatial inequalities caused by capitalism (e.g. Hall, 1998), planning now sees promoting economic growth as

its chief goal (e.g. CEC, 1999). The normative model of the theoretical rationale behind spatial planning- 'Figure 2'- should therefore be re-drawn to represent the actuality of planning:

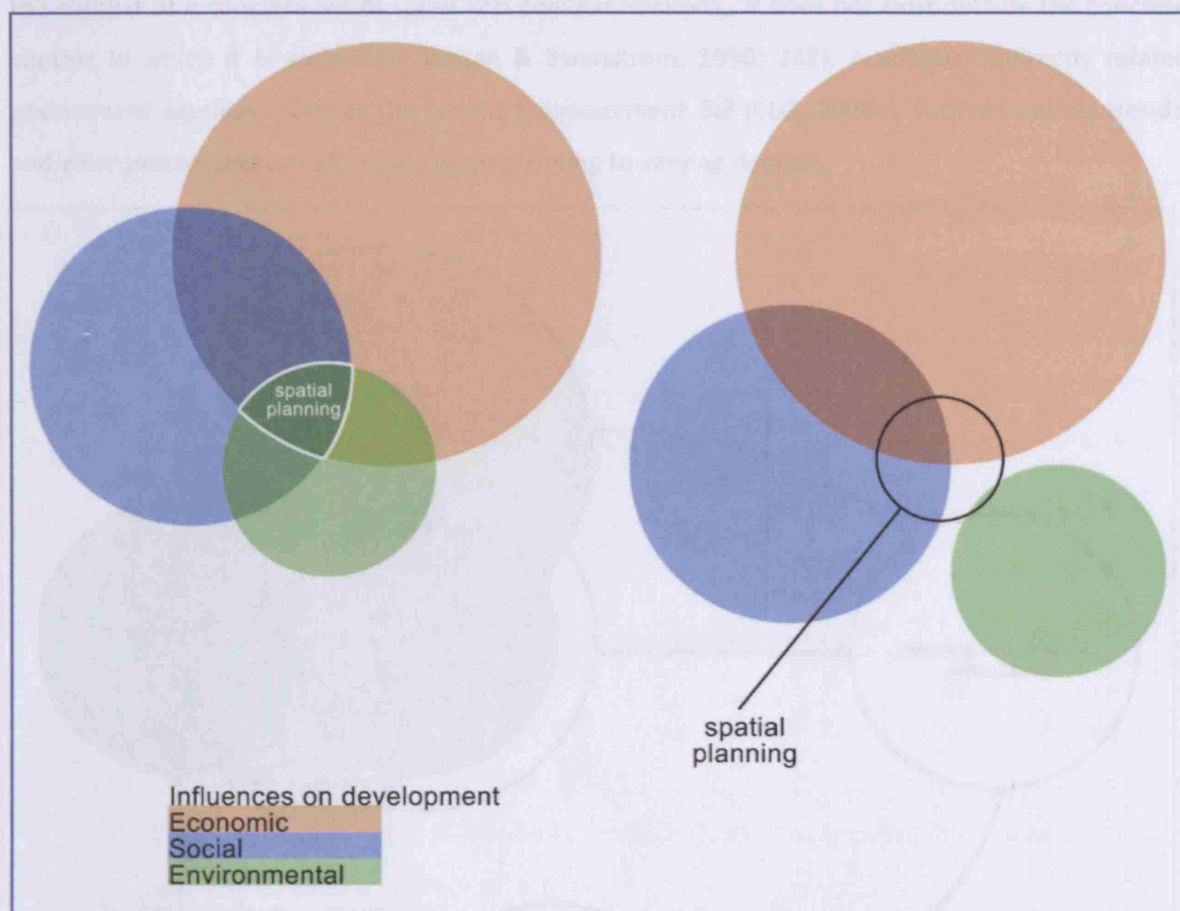


Figure 3. Nuanced representations attempting to convey more realistically the actuality rather than theoretical operation of spatial planning, where different interests in the planning system are accorded different degrees of influence.

Although much has been made of the need to increase planning's efficiency and responsiveness to increasingly de-territorialised economic investment opportunities (e.g. Barker, 2004), the relationship between responsiveness to economic forces and operating in society's sustainable well-being is tense. France is a case-in-point, as once the post-war economic forces that had promoted labour immigration policies and intensive development of *banlieues*- high density housing estates on the periphery of existing settlements designed as dormitory worker accommodation- fell flat, profoundly negative social consequences resulted (Ardagh, 2000). Given that the UK is now on the cusp of a housing market downturn for the first time since New Labour came to power and oversaw the re-orientation of the planning system towards its current 'spatial' ethos (e.g. Willis, 2008), profound questions are being asked of the ability of the planning system to continue to deliver (e.g. Urry, 2008).

3. Research design

Furthermore, as has been implicit throughout this section, planning, like economics, operates within the context of a concrete set of social and political relations; 'it does not exist outside the concrete context in which it is embodied' (Logan & Swanstrom, 1990: 242). Academia, indirectly related government agendas- such as the recent *Empowerment Bill* (CLG, 2008c), socio-economic trends, and environmental issues all impact upon planning to varying degrees.

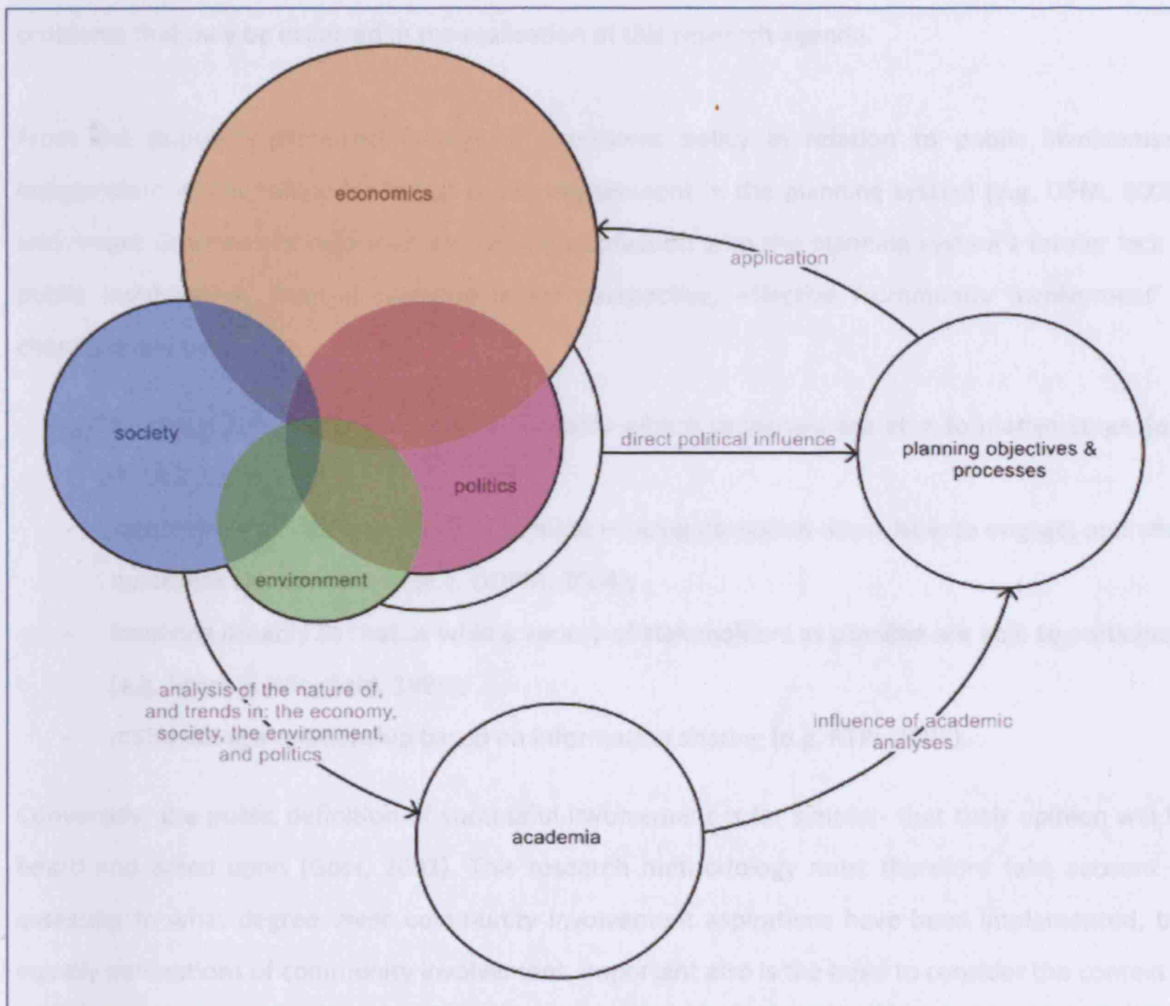


Figure 4. An attempt to graphically convey the complexity of issues that impact upon the UK spatial planning system.

It is essential that this work takes account of the broader context in which planning operates in order to produce a nuanced and holistic evaluation of the effectiveness of PPAs in involving communities in the orchestration of complex large-scale development proposals: PPAs are *de facto* an ineffective mechanism for orchestrating community involvement if they merely contribute to the 'scrap-yard' of discarded policy amassed in the planning system by obsolescing once the impetuses that catalysed their creation are spent (Jones & Ward, 2002: 475).

3. Research design

In pursuit of this project's overall aims, and conditioned by the critical depth these issues were supplemented by in *Section 2. Theoretical background*, this section outlines a research methodology for refreshing, broadening, and deepening existing analysis into the effectiveness of PPAs in involving communities in the formulation of large-scale developments, before highlighting potential problems that may be occurred in the realisation of this research agenda.

From the popularly-perceived failings of eco-towns policy in relation to public involvement, independent voices calling for better public engagement in the planning system (e.g. OPM, 2005), and recent Government reforms based on dissatisfaction with the planning system's former lack of public involvement, from a planning policy perspective, effective 'community involvement' is characterised by:

- involving the public early and profoundly where proposals are at a formative stage (e.g. ATLAS, 2007);
- establishing procedural clarity as to what is being consulted upon, how to engage, and what outcomes can be realised (e.g. ODPM, 2004);
- involving broadly so that as wide a variety of stakeholders as possible are able to participate (e.g. Leach & Wingfield, 1999);
- maintaining a relationship based on information sharing (e.g. RTPI, 2007).

Conversely, the public definition of successful involvement is far simpler- that their opinion will be heard and acted upon (Goss, 2001). This research methodology must therefore take account of assessing to what degree these community involvement aspirations have been implemented, but equally perceptions of community involvement. Important also is the need to consider the context in which planning operates- see *Section 2.4. Contemporary issues faced by planning*, and the bearing this has on PPAs. This research methodology must in addition reconcile policy perspectives with practical application experience.

3.1. Research phases and methodologies

Research phase one- conduct semi-structured face-to-face interviews with individuals directly involved in the creation, monitoring, and revision of PPA policy in each of the three organisations which developed the concept: CLG, ATLAS, and PAS. This phase will contribute towards all three

overarching research aims and inform the orientation of subsequent research phases. In the absence of any contemporary quantitative data as to the current prevalence of PPAs – see *Section 2.2 Planning Performance Agreements*- interviewees’ perspectives will be invaluable as a tentative proxy for the current situation, what factors or influences are on the contemporary agenda, and what direction policy may take in the future. Interviewing PPA policy-makers will allow a great depth of subject matter to be considered- the missing dynamics of existing evaluation such as community involvement in the PPA process, and the influence of factors such as planning system evolution, political imperatives, and market conditions, for example- that could not be isolated via secondary-source research alone.

Research phase two- re-evaluate responses to the Communities and Local Government PPA consultation held in 2007, focusing in particular on those questions asked most relevant to this work’s research aims, and on any comments unconsidered in the CLG overview of consultation overview (CLG, 2007c). This phase will contribute predominantly to overarching research aims ‘A’ and ‘B’, alongside acting as an important bridge between the policy perspectives of research phase one and the implementation side of PPAs, as many respondents have practical experience of involvement in dealing with major developments. As private sector respondents, public bodies, and unaffiliated members of the public may all have different perceptions of the process, this research phase will additionally act as an important source of information as to how PPAs operate within the wider context of factors impacting upon planning.

Research phase three- evaluate the practical process of implementing a PPA in two divergent case-studies through contacting both developers and Local Authorities involved. This research phase will contribute almost exclusively to overarching aim ‘A’- evaluating the effectiveness of PPAs specifically in regards their procedures for involving communities. As large-scale developments take years not only to plan but also to come to fruition on the ground, this section will not focus on the minutiae of development practicalities but use the perspectives of those involved in the PPA process to evidence dynamics of community involvement. As it is impossible to quantify whether a development arrived at through the PPA approach is ‘better’ or ‘better tailored’ to the needs of the local community as this would inevitably rely on a counter-factual, and therefore unsubstantiated, argument, perspectives of the PPA process are the only readily accessible source material for investigating the mechanics of community involvement at a practical level.

3.2. Potential shortcomings envisaged

Before presenting the undertakings of this three-phase research methodology, it is essential to note two potential shortcomings:

Assuring sufficient responses. As outlined in *Section 2.2 Planning Performance Agreements*, that PPAs, and community involvement in planning more generally, have been the subject of considerable existing evaluation is problematic in terms of assuring that those whose views are sought are sufficiently motivated to again engage with a similar research effort.

Insufficient quantitative foundations. As there is currently no systematic evaluation of the number of PPAs in operation, and as this research efforts seeks to investigate the missing dynamics of existing considerations of PPAs such as community involvement and the influence of factors external to the planning system, the research basis for this work relies on a considerable qualitative element. Although this is the only viable way to unpick some of the more complex dynamics at play and deepen existing analyses, it may equally incur the criticism that conclusions are largely conjectural. Attempts will be made to circumvent this criticism through critically evaluating the project's research approach throughout, especially in *Section 5.4. Self-referential evaluation*.

4. Analyses

4.1. Research phase one- interviews with PPA policy-makers

Semi-structured face-to-face interviews with five individuals directly involved with PPAs from CLG, PAS, and ATLAS- the three organisations involved in the creation, evaluation, and promotion of PPAs- indicated that PPAs offered significant potential for increasing the breadth and depth of public involvement in the orchestration of large-scale developments. Indeed, from a policy-maker perspective, PPAs were presented as a robust and widely-supported mechanism largely impervious to potential market volatility or changing political ideologies. Therefore in concept policy-makers inferred eco-towns would benefit from adopting a PPA approach, nonetheless there was contention as to whether the sheer magnitude and complexity of eco-towns necessitated a more dedicated and specific approach.

Contact with relevant individuals in each organisation was established via e-mail which included an interview proforma- the full reproduction of which is in *Appendix 1*. Each of the five topics considered during interviews links either directly or tangentially to the three overarching aims of this work as described in *Section 1.2. Aims*:

Topic Number	Topic addressed in interview	Relevance to research aims
1	The context in which PPAs emerged as a concept	This issue is key in assessing the importance of factors such as political imperatives, planning system change, and market conditions- aim 'B'. Why PPAs emerged equally hints at whether they are a long-sighted policy mechanism or merely responsive to short-term factors.
2	The current operation of PPAs	How PPAs currently operate is crucial in exploring differences between policy statements and implementation, alongside policy drift or evolution. This topic therefore contributes primarily towards aims 'B' and 'C' as contemporary planning is a state of continual evolution (Bradwell et al. 2006), and as altering PPA usage may indicate applicability to the eco-town concept.

3	PPA arrangements for community involvement	Self-evidently directly relevant towards aim 'A'.
4	The success of existing PPA analyses	Whether existing reviews of PPAs have been sufficiently critical or sufficiently reliable contributes to an evaluation of PPAs in the broader context of planning- aim 'B'. Additionally, perceptions of this issue will inform future phases of research as challenging lacks in current literature will deepen existing understanding of PPA operation.
5	Planning, political, and market influences on PPAs	The influence of factors wider than the relationships between developer, local authority, and community around a particular proposal contribute directly towards aim 'B'.
6	The potential utility of PPAs in relation to 'eco-towns'	Self-evidently directly relevant towards aim 'C'.

Table 1. Relationship between first research phase interview topics and overarching project aims.

With the explicit permission of all respondents, transcripts of each interview were recorded and, where appropriate, have been quoted in subsequent analysis to substantiate statements. In the interests of data-protection, however, other than a statement of organisational affiliation and brief overview of professional responsibilities, interviewees have not been named, but rather referred to by the code in the first column of the subsequent table:

Respondent Code	Interview date	Organisation	Role
R1	28 May 2008	CLG	Involved in commissioning the PDA pilot study and developing CLG PPA policy
R2	28 May 2008	PAS	Responsible for orchestrating PDA pilot project and subsequently advising CLG
R3	29 May 2008	CLG	Responsible for monitoring PPA usage and generating CLG policy and advice on PPAs
R4	4 May 2008	ATLAS	Responsible for promoting PPAs, training PPA facilitators, and producing PPA guidance

R5	4 May 2008	ATLAS	Involved in promoting PPAs, and advising parties interested in establishing a PPA
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Table 2. Interviewee citation codes, date of interview, organisational affiliation, and brief overview of responsibilities in regards PPAs.

At the outset of each interview I explained the purpose of my study, established that I was not looking to impose any bias on the subject in question, and encouraged interviewees to criticise my work or mention any factors they believed I had omitted. The analysis of each of the six interview topics presented in *Table 1.* forms the structure of this section, before a brief consideration of how evidence from this research phase has contributed towards my three overarching research aims, and how this initial research phase informs subsequent research phases.

4.1.1. The context in which PPAs emerged

Interviewees supported the Planning White Paper assertion (CLG, 2007b: 11) that the speed and efficiency of the planning system has greatly improved since ‘Best Value Planning Indicator 109a’- that sixty percent of major applications should be processed by Local Authorities within thirteen weeks- was first suggested in the 2001 Planning Green Paper (P4). Yet interviewees were universally keen to establish that the statistical improvement in the speed of processing applications obscures the perverse outcome that planning authorities became reluctant even to deal with applications that, owing to complexity, might take longer than thirteen weeks to consider, ‘there was a widely held belief that you could never get a major major application decided in the thirteen week deadline, so they were being left, kicked into long grass’ (P1).

There also appears to have been a long-standing mismatch between developer and authority perspectives that often lead to developer proposals taking insufficient account of Local Authority requirements, such as requirements for community involvement, and thereby incurring both unnecessary delay and expenditure (P3). The impetus for developing Planning Performance Agreements therefore appears to have emerged principally from the wants of developers (e.g. P1). Furthermore, interviewees suggested that PPAs appeared to have formalised existing best-practice in project management from the private-sector, and to a lesser extent similar policy precursors in Local Authorities (P4).

4.1.2. The current operation of PPAs

All interviewees noted that current PPA usage is subject to no systematic evaluation (P4). Indeed, the lack of tangible documents emerging from specific developments which have incorporated the PPA process exacerbates the difficulty in establishing the contemporary prevalence or effectiveness of the policy: 'what very few people [involved in the PPA pilot study] actually managed to do was have a written agreement signed and accepted' (P2). Anecdotally, interviewees suggested that this reticence to create signed and agreed documents in the PPA process stems from the fear that the process will then take a more legally-binding form where accountability for failure to deliver will be sought (P2). Nonetheless, the overall impression interviewees expressed was that PPA use was increasing incrementally.

Whether PPAs are currently being used for a wider variety of developments than the remit in which they were originally conceived is again unanswerable in concrete terms owing to the lack of contemporary evaluation. All interviewees, however, believed that PPAs 'should evolve...should be different to reflect [different situations]' (P1). The theoretical kernel of PPAs- harmonising perspectives and orchestrating interaction along project-management lines- was perceived as applicable to all planning situations: 'PPAs can be applied to any sort of development, they haven't been applied to nuclear power stations yet, but there's no reason why they shouldn't be- it is a common sense project management approach that actually allows parties, external parties as well, to see what's going on' (P4).

4.1.3. PPA arrangements for community involvement

Interviewees suggested a major benefit of PPAs was that by exempting the processing of applications from the thirteen weeks BVPI 109a target, they therefore allowed greater scope for meaningful consultation: 'thirteen weeks is an insufficient period for deep or complex community involvement, whereas, it would be if a number of consultation arrangements had already been put in place' (P3). It appears that not only does the quantity of community involvement in the development process increase through use of Planning Performance Agreement procedure, but so too does the quality of that participation: 'one of the reasons why community involvement is a feature of this is because we also felt that where developers were coming forward, there were lots of pre-application discussions before this happened, it was mostly P.R. work saying how super their

development was with lots of nice graphics of people sipping coffee, that sort of thing. So it was a more about go out and ask people actually about what they want.’ (P1).

Nonetheless interviewees pointed out that the PPA process was not wholly beneficial in terms of deepening public involvement in the development process, chiefly as communities may perceive that through entering into pre-application discussions with the developer, the Local Authority has colluded to grant permission (e.g. P2). Additionally, it was noted that ‘to be effective and to really engage the community you’re perhaps looking at spending more money than you would do by sending a letter to say this [development] is going to happen’ (P3). As PPA related guidance is largely silent about leveraging additional resources above those that can already be established by Local Authorities for pre-application work under the 2003 Local Government Act, whether Local Authorities would be capable of realising the potential public involvement benefits of the PPA process is largely unresolved.

4.1.4. The success of existing PPA analyses

The general perception aired in relation to the effectiveness of existing analyses of PPAs was that they had broadly considered the correct issues, albeit if the CLG consultation was insufficiently thorough by being one of a suite of consultations in relation to the Planning White Paper (P4). When pressed, however, the area chiefly noted as having received insufficient consideration in existing PPA analysis was that of to what degree the arrangement was legally binding on behalf of those parties involved, although community involvement in the process also emerged as an interesting and as-yet under considered element of PPA operation (P1). In direct contrast to the ATLAS (P4) assertion that detailed contemporary analysis of PPA usage and effectiveness is required, a CLG interviewee noted that it’s potentially simply too early to derive any meaningful analysis of PPA implementation (P1).

4.1.5. Planning, political, and market influences on PPAs

It is essential to consider wider factors in planning, politics, and the market in order to determine the effectiveness of PPAs in involving communities in large-scale developments as it is commonly acknowledged that much research into planning policy focuses on process to the detriment of context (Cullingworth & Nadin, 2006). Indeed, in relation to declining market forces, it was noted that ‘when we did the Housing Green Paper, it was right at the top of the housing market... now we’re at the other end, and there must be differences- I’m sure that developers are drawing back

from everything... if you're cutting staff back, it's [community involvement is] the first thing that goes' (P1). It seems, however, that as interviewees saw the impetus for PPAs stemming principally from the requirements of developers a market downturn would reduce the overall number of applications rather than those progressed via the PPA process (P3). Anecdotally, in the same way as politics has been characterised as decreasingly ideological (e.g. Fukuyama, 2001), PPAs appear relatively apolitical as their approach is largely acceptable to all dominant political hues (e.g. P1 & P4).

4.1.6. Potential utility in relation to eco-towns

The ATLAS officer interviewed succinctly expressed a commonly held perception amongst interviewees in relation to the applicability of the PPA process to 'eco-towns', 'it's not about why? It's more about why not?' (P4). Nonetheless interviewees were split as to whether eco-towns would employ a PPA approach by the letter, or whether the degree of complexity would necessitate a dedicated team and process in itself. Indeed, it appears that, 'in the eco-towns where it's going well... it is because they've gone out and done a lot of community work' (P1), and as it has already been established in *Section 2.2. Planning Performance Agreements* that PPAs offer the potential- albeit with some potential limitations- of involving communities to a more profound degree in the orchestration of large-scale developments, it is logical that the principles advocated in PPAs would be useful in redressing the popularly-perceived lack of public involvement in the eco-towns programme as described in *Section 2.3. Eco-towns programme*.

4.1.7. Conclusion to research phase one

Interviewees felt that the PPA process offered significant potential for increasing the effectiveness of community involvement in planning by:

- Establishing a realistic timetable for processing complex developments rather than the arbitrary thirteen weeks BVPI 109a target, and therefore allowing the potential for a greater scope of community consultation exercises;
- Establishing a clear timetable and responsibilities for conducting community engagement endeavours;
- Freeing-up additional resources for facilitating community involvement events and processes owing to the reduction of duplicated effort;

- Being, in effect, a record of the pre-application process that would serve to demonstrate all parties involved in a proposal were acting legitimately;

Nonetheless, interviewees unanimously mentioned that the PPA process equally incurs the problem of being perceived by the public as collusion between developer and authority to deliver development rather than manage the pre-application stages of a proposal- a misconception typically based on insufficient transparency as regards PPA processes.

PPAs were typically represented as an apolitical project-management tool acceptable to any major contemporary political hue. Indeed, interviewees related that PPAs were essentially project-management tools that built on existing Local Authority, and, to a greater degree, private-sector experience. As such, PPAs appear to be more a formalisation of existing best-practice rather than policy fad. Policy-makers therefore both explicitly and by inference suggested that market volatility would have little impact on PPA use as developers and authorities appreciate the certainty and clarity the process establishes.

Conversely, interviewees were divided as to the benefits of PPAs for community involvement in relation to eco-towns. CLG interviewees tended to believe the process would be applicable, whereas ATLAS and PAS- those with direct involvement in the pilot- tended to think this would be stretching the PPA policy remit, and that such considerable developments would necessitate a more specific approach and dedicated set of resources.

Nonetheless, the overwhelmingly positive perspective interviewees held of the PPA process in relation this project's research aims will be challenged in research phase two- re-examining CLG consultation responses. In the following section it will therefore be particularly important to focus on respondent perception of the CLG PPA consultation process itself, potential third-party perception of PPAs, and to what extent PPAs are perceived to be responding to short-term rather than systemic planning, political, and economic imperatives.

4.2. Research phase two- re-examining CLG PPA consultation responses

In order to establish an element of quantitative breadth as a corollary to the qualitative depth achieved through interviews with policy-makers in research phase one, and to act as a bridge between 'policy' and 'implementation' perspectives, the responses received by Communities and Local Government in relation to their public consultation paper *Planning Performance Agreements: a new way to manage major planning applications* (2007) were re-examined in light of this work's three research aims. Although the overwhelming majority- some eighty-nine per cent- of respondents supported the concept of PPAs- this statistic masks divergent respondent perceptions as to what the PPA process seeks to achieve; numerous, predominantly private-sector, respondents erroneously believed that PPAs sought primarily to speed up rather than improve the quality of development. Indeed, responses to the CLG PPA consultation were generally more critical than policy-maker perspectives: eleven percent of replies noted that the chief unintended consequence of the process would be adverse public perception in regards collusion between developer and Local Authority.

Five of the eight questions posed in the CLG PPA consultation concerned technicalities such as precisely defining the attributes of development proposals that might employ a PPA approach, funding arrangements, and the adequacy of proposed policy guidance- issues relatively incidental to this work's research aims. Conversely, the other three questions posed by the consultation are highly relevant:

<i>CLG Consultation question</i> (numbers relate to the order in which they were originally posed by CLG)	<i>Relevance to research aims</i>
1. Do you agree with the principle of having Planning Performance Agreements?	Responses to this prompt will primarily indicate how those on the 'implementation' level of PPAs perceive the concept in relation to the contemporary operation of the planning system- aim 'B'.
4. Do you think PPAs are the most effective way to ensure that Local Authorities and applicants/ developers devote sufficient resources to the delivery of decisions on significant major applications?	Whether respondents view PPAs as the most effective mechanism for ensuring sufficient attention is directed towards complex planning applications will contribute to evaluating both PPAs in the wider context of contemporary planning- aim 'B'- and may

	also elucidate themes in regards community involvement in the process- aim 'A'.
8. What are the likely effects of the changes on you, or the group or business or Local Authority you represent? Will there be unintended consequences?	The first research phase established that CLG consultation had been excessively focused on specific questions to the detriment of incorporating wider perspectives. Considering what respondents have ventured 'in the margins' may, or may not, reveal important hitherto un-aided issues.

Table 3. Relationship between CLG consultation questions and this project's research aims.

The contributions of all 204 respondents, as opposed to the derived analysis that constitutes the substance of this section, can be found in *Appendix 2*. Respondents subsequently cited have been referred to as R01, R02, R03, etc.- a notation that correlates with their full submission, again as shown in *Appendix 2*. In the interests of data-protection respondents are not named directly,¹ but grouped into the following nine categories based on their area of operation or the issues with which they are particularly concerned:

<i>Organisation type</i>	<i>Responses received</i>	<i>Percentage of responses</i>
Environmental lobbying group	5	2.5
Individual (unaffiliated to any organisation)	2	1.0
Local Authority	109	53.4
Planning related NGO	4	2.0
Public-sector body (other than Local Authority)	16	20.1
Private-sector developer or consultancy	41	7.8
Representative body (of civic interests)	7	3.4
Representative body (of private interests)	3	1.5
Representative body (of public interests)	8	3.9
Utilities, minerals, or waste group	9	4.4
<i>Total</i>	<i>204</i>	<i>100%</i>

Table 4. number and relative percentage of CLG PPA consultation responses by respondent type.

¹ Although the CLG consultation was public certain respondents noted that they did not wish for their submissions to be made publicly accessible- it is therefore simpler to omit identification from all responses as no value will be lost through identifying respondents solely by the categories established in *Table 4*.

This section will analyse responses received to CLG consultation questions 1 and 4 before considering additional issues aired by respondents in relation to question 8, or indeed issues unrelated to any specific question, before concluding by considering how re-examining CLG consultation responses has deepened existing analyses of PPAs and contributed towards the three overarching research aims of this project.

4.2.1. The principle of PPAs

Response	Percentage
In support	88.7
In opposition	9.3
No comment	2.0

Respondents frequently re-iterated similar statements as made in Government policy explaining the rationale behind PPAs such as the processes offering greater certainty over procedural timescales, a focus on quality of outcome rather than speed, and improved clarity over resource allocations, responsibilities of involved parties, and decision-making processes.

Specifically in relation to PPAs and community involvement, one Local Authority noted that recent planning system changes promoting greater public involvement have themselves created additional resource demands: ‘Over recent years the increased amount of information forming part of a major application and the need to consult widely has often resulted in the Council failing to determine these applications within the deadline’ (R86). Although thirteen Local Authorities feared the process of establishing PPAs would further strain resources, there was nevertheless a recognition that PPAs might offer an additional means of involving the public at an early, and therefore formative, stage of development formulation, especially as developers fail on occasions ‘to undertake proper pre-application consultation with interested third parties and the local community’ (R48). Indeed, the ethos behind PPAs was equally praised by the tertiary sector, ‘[organisation] welcomes Planning Performance Agreements as a way of managing the relationship between the LPA and the local community’ (R4).

Yet, whereas Local Authorities overwhelmingly perceived PPAs as a mechanism for focusing efforts on delivering higher quality development rather than accelerating the planning process, private-

sector views were less clear on this distinction. One developer, for example, explicitly stated how the concept of PPAs was welcome 'as a means to speed-up the processing of planning applications on large-scale major planning projects' (R117). It therefore appears that although statistically the concept of PPAs is overwhelmingly supported, there are differing interpretations- chiefly along public and private sector lines- as to what the concept actually seeks to achieve.

4.2.2. The effectiveness of PPAs in assuring resource allocation to major projects

Response	Percentage
Effective	42.2
Ineffective	22.5
No comment	35.3

PPAs were frequently perceived as offering a potential means of harmonising understanding between authority and developer from the outset of formulating a proposal- thereby reducing resource duplication or wasted effort caused by poor communication: 'the process can result in the sharing of resources, ensuring very high levels of efficiency between applicants and LPAs', (R161)- a point equally asserted during interviews with policy makers (e.g. P1; P3; P4).

Nonetheless, PPAs are undoubtedly mechanisms that operate firmly, 'within the constraints of the present system' (R185). Thirty-four respondents suggested that resource constraints in the UK planning system would act as a considerable limiting factor to the successful implementation of PPAs: 'Local Planning Authorities are seriously short of resources, especially experienced planning staff to perform this function' (R101). Indeed, the issue of securing good quality development outcomes sensitive to the needs of local communities is more fundamental than a matter of sufficient resource allocation, it is an issue that one Local Authority felt would not be resolved 'until the profile of the planning service is raised within the Local Authority structure and hierarchy' (R200).

4.2.3. Other issues raised by respondents

The overwhelming issue raised in relation to any potential unintended consequences of the PPA approach was that ‘third-parties’- i.e. neither Local Authority nor developer, yet those affected by the proposal to some degree- would perceive the arrangement as collusion to deliver planning consent; certain developer responses viewing the process overwhelmingly as a means by which to accelerate the speed of the planning process cited in *Section 4.2.1 The principle of PPAs* tend to confirm this perception. Seven respondents suggested that perception of collusion between developer and Local Authority could be circumvented by making the process both as transparent as possible, and ensuring that all PPA documents are publicly accessible- clearly an unrealised suggestion, as this project’s first research phase showed that not even those currently involved in the promotion of PPAs are aware of how widespread PPA usage has become (e.g. P2). Nonetheless, numerous organisations saw strong potential in the PPA concept to involve communities earlier and to a far greater extent in the development process than would otherwise have been achieved: through using the concepts embodied in the PPA approach ‘developers tend to consult the wider community earlier on major applications, building greater community engagement in the planning process... as such issues are discussed up front, and developers can submit more detailed and thorough planning applications’ (R190).

4.2.4. Conclusion to research phase two

Respondents to the CLG PPA consultation process were divided in what they perceived the essential purpose of PPAs to be: of the only two unaffiliated individuals that responded one welcomed the concept (R7), whereas the other rejected it as in effect paying councils ‘to speed up processes... at the expense of fair and proper hearings’(R8). Numerous respondents erroneously viewed PPAs as predominantly a mechanism to speed up the development process rather than of working towards a better quality outcome- a misconception equally revealed in research phase one, in which it was highlighted that many developers hadn’t fully appreciated is that ‘this agreement was bestowing responsibilities on them as well... in more work up-front, or more commitments’ (P2). Nonetheless that there was considerable, although clearly not unequivocal, support for the PPA principle suggests that the policy is popularly perceived as much needed rather than centrally-imposed whim (R123).

Nonetheless, although PPAs were welcomed by some as they allowed exemption from the BVPI 109a thirteen week target and therefore accorded greater flexibility in ‘the timing and scope of liaison with the community [which] can be affected by progress on commercial negotiations or technical research...’ (R203), twenty-two respondents suggested that they perceived that the chief unintended consequence of the process would be third-party perception of collusion. PPAs therefore offer both potential and problems for increasing the effectiveness of involving the public in the planning process in relation to significant developments. PPA case studies will continue to push this project’s research agenda further into the realm of practical application. Based on the themes emergent in relation to CLG consultation responses it will be highly important to focus on how well publicised the aims of the process were, how third-parties perceived PPAs, and practically how the public was involved in the process of developing a proposal differently to that which would have occurred under routine LPA planning statutory obligation.

4.3. Research phase three- PPA implementation case studies

The motivation for the third research phase- examining case studies of the practical implementation of the PPA process- was to address the commonly acknowledged disparity between planning policy and planning practice: 'theory often misses the real-life dramas unfolding in day-to-day encounters' (Goss, 2001: 2). Whereas the first research phase contributed towards all three project aims, the second phase towards aims 'A' and 'B', studies of PPA usage contribute almost exclusively to aim 'A'- evaluating PPAs specifically in relation to their effectiveness in involving communities in the orchestration of development- by considering the dynamics of when and how communities were involved in the process, alongside what outcome was realised. The general picture generated from PPA implementation in both Lancaster and Lambeth is markedly less positive than that of either two preceding research phases. In Lancaster the public perceived the process as collusion between Local Authority and developer to exclude public input, and in Lambeth- although this instance is often presented as exemplary in terms of public involvement (e.g. ATLAS, 2008a) - in actuality most of the impetus behind additional consultation came from the agency of the RSL leading the proposal rather than as a result of the PPA process itself.

In the absence of any holistic contemporary data as to current PPA implementation, case studies were selected through both desk-based secondary source study and interviewees' suggestions. In selecting two case studies, the aim was to encompass as wide a variety of PPA implementation experience as possible. Therefore, whereas Lancaster's 'Castlevue' redevelopment scheme has a strong retail-element, is private-developer led, and experienced considerable problems in relation to community involvement, the London Borough of Lambeth's 'Stockwell Park' regeneration project was housing-led, developed between RSL and Local Authority, and privileged community involvement in the PPA process from the outset.

This third research phase encountered considerable difficulty in realising the methodology established for it in *Section 3.1 Research Phases and Methodologies*. A succinct set of related questions- which can be viewed in full in *Appendix 3*- emailed to local authority case officers and development partners of both projects was replied to only by Lambeth Council. This work has therefore fallen into the anticipated pitfall of poor private-sector responsiveness noted in *Planning Community Needs* (TCPA, 2008). Nonetheless desk-based research and non-public documents to which ATLAS allowed access have, in part, compensated for the unresponsiveness of Lancaster City Council, and all related developers.

4.3.1. Castleview, Lancaster



Figure 5. Developer Centros Miller's proposal (Centros, 2008: 1). Maps illustrating the location of both Castleview and Stockwell Park proposals have been consciously omitted as they would be of little relevance given that case-studies concern development-related process not the minutiae of physical development practicalities.

A PPA approach was adopted by Lancaster City Council and developer Centros Miller in relation to the proposed retail-led, mixed-use redevelopment of a large urban district, 'Castleview'. The draft Planning Delivery Agreement established through the process is reproduced in full in *Appendix 4*. Following successive rounds of consultation and revision the proposal was submitted in June 2008, and is currently awaiting determination (Centros, 2008). This case-study has been selected as both secondary-source study and interviews with policy-makers in research phase one highlighted Lancaster as an instance in which community perspectives proved a highly contentious issue in the pre-application process (e.g. P4).

Indeed, Andrew Dobson- head of planning at Lancaster City Council- described the project as an 'uphill challenge to regenerate', given the 'sceptical local community blocking progress' (ATLAS, 2008c). Consulting Castleview's draft PPA, reproduced in full in *Appendix 4*, it is easy to see how this

statements is that Lancaster City Council and Centros Miller would 'work together to an agreed set of goals to deliver a high quality viable scheme'. The Castlevue regeneration project is therefore one 'where there were accusations the planner and developer were 'in league', to the exclusion and detriment of the community' (Databuild, 2006: 12).

Nonetheless, the PPA system- particularly the City Council's development of a major-applications 'Charter' that established their position in regards all major applications rather than this specific instance- was useful as a means of demonstrating correct procedures were being followed. Eventually, public perception of collusion with the developer was circumscribed by a revised approach that accorded public involvement and procedural clarity a higher priority (ATLAS, 2008a).

4.3.2. Stockwell Park, Lambeth, London

Figure 6. Consultants BPTWM's impression of the completed redevelopment project (BPTW, 2008).

A PPA approach was employed for the housing-led, mixed-use redevelopment of the Stockwell Park area by Lambeth Council and the RSL Network Housing Group. The 'Planning Delivery Agreement Protocol' established through this process is reproduced in full in *Appendix 5*. The proposal for the redesign, refurbishment, and erection of new dwellings in the Stockwell Park area received outline planning permission in February 2007 (Mayor of London, 2007). This example of practical PPA implementation has been selected as it has

often been promoted as an exemplar of the successful operation of PPAs; during a site-visit on 4 June 2008 Parliamentary Under-Secretary of State Ian Wright commended all parties involved 'for contributing to the success of the PPA pilot, which I am pleased to see has resulted in a successful development' (CLG, 2008a). Indeed, interviewees suggested that community aspects of the Stockwell Park development were of paramount importance- that Lambeth Council established from

the outset that 'this is about our proposal which is about meeting the aims and objectives of the community within it' (P3).

The overall impression received from Lambeth Council is that the PPA was a very effective tool 'as it provided a timetable for processing the application and provided a mechanism for the identification of key issues and tasks' (Lambeth Council Officer response to email correspondence reproduced in *Appendix 3*), and as it clearly established responsibilities for community engagement processes (see in particular Section 4, 'Community Engagement Strategy' in Stockwell Park's 'Planning Delivery Agreement' protocol reproduced in *Appendix 5*). Yet, reviewing objections made to the proposal, it appears that the consultation area was drawn overly selectively around the development: 'surrounding community or neighbourhood users [were not] consulted... the proposed taller buildings will impact upon [the] adjacent townscape' (Mayor of London, 2007). Although this consultation deficit was subsequently rectified (ATLAS, 2008a), it is curious that a development publicised in numerous locations (e.g. ATLAS, 2008a; CLG, 2008a) as exemplary in terms of community involvement experienced such shortcomings. Indeed, in the case of Stockwell Park, it appears that the impetus for considerable community involvement came from the agency of the Network Housing Group- which had conducted considerable consultation prior to the establishment of a PPA- rather than as a result of the PPA process itself: 'there was no specific community involvement in the PPA process. It was mainly used as a tool by ourselves [Lambeth Council] and the applicants to manage the planning process' (Lambeth Council Officer).

5. Conclusions

5.1. The procedural efficacy of PPAs in involving communities

Directly and indirectly PPAs present considerable opportunity for adding additional breadth and depth of community involvement in the formative stage of significant developments- a point clearly made by numerous interviewees in research phase one. Directly, PPA policy guidance iterates how the process should involve the public earlier and by means, such as 'enquiry by design', that encourage a deeper level of community input than is required by statutory obligation alone. Indeed, as PPAs are a highly flexible tool, modifiable to suit individual developments, community representation has on occasions been present from the very outset, or inception, of a PPA- as was the case in Bristol's 'Dove Lane' redevelopment project (P4). Clearly PPA policy has taken account of many core tenets of the proliferation of 'best-practice' community engagement guides- as more fully considered in *Section 3. Research design*- such as engaging early, broadly, deeply, and continually (e.g. OPM, 2006). In policy terms, therefore, factoring in 'communities' in the PPA process has been accorded the same priority as in the spatial planning system as a whole (CLG, 2005: 12).

Yet, it becomes apparent that policy statements as to the aspirations of PPAs relate imperfectly to perceptions of the PPA process and how PPAs have operated in practice. Lambeth, for example- often cited as a development that privileged strong public involvement in the process- fails to demonstrate these direct PPA benefits for community involvement in practice, as greater public engagement was factored in by the RSL leading the proposal prior to the establishment of a PPA rather than as a consequence. Nonetheless, it still appears that in the case of Lambeth, that the indirect effects of the PPA process on community involvement proved beneficial: i.e. exemption from Government-established planning application determination targets allowed for the requisite amount of time to be dedicated to a development of such complexity, and responsibilities along with a timescale for future rounds of community consultation were clearly established at the outset of the pre-application process (see Lambeth Planning Delivery Agreement Protocol, section 4, reproduced in *Appendix 5*).

As numerous respondents to the CLG PPA consultation noted, however, although possessing both direct and indirect benefits for community involvement in the orchestration of significant developments both in policy and in practice, the PPA approach does not resolve more fundamental issues inhibiting the delivery of quality outcomes in the planning system such negative as public

perception of the planning process, resource scarcity, the status of planning within the Local Authority, and fundamentally the inertia of inherited planning practice that on occasions confounds recent policy rhetoric privileging community views. Although it is clear such mechanisms as PPAs are themselves affecting a 'culture change' in planning by encouraging a more active role of the Local Authority in the development process that bridges the traditional, although now considerably blurred (Goss, 2001), divide between public and private sector perspectives (e.g. P2 & P4), the will, or lack of will, of those involved in the process to involve communities effectively clearly outweighs all policy rhetoric.

As issues more fundamental to the planning system dwarf considerations of the procedural efficacy of PPAs, evaluating the effectiveness of PPAs in involving communities in the developmental process is effectively attempting to run before being able to walk. As *Section 2.3. Community involvement in planning* notes, the very notion of 'community' is contested, never explicitly considered in policy, and clearly possesses very different meanings for different people (Delantry, 2003). Communities can no longer be defined by distinct spatial boundaries as was possible in an earlier age of substantially less personal mobility and access to information (Healy, 2007), may exclude as much as include, and may not necessarily know what is best for their sustainable future (Biddulph, 2000). Therefore, although PPAs offer clear potential for improving the effectiveness of community involvement, they are very much a mechanism that operates within the far more pressing limitations of the UK planning system, and one premised on the largely unsubstantiated theoretical ground that working towards greater community involvement in planning in an unquestioned positive aspiration.

5.2. PPAs in the context of contemporary issues faced by the planning system at large

Although largely anecdotal, all research phases to varying degrees illustrates a similar conclusion, that PPAs are a relatively apolitical tool which should be little affected by changing market conditions. Policy-makers, in contrast to the inference made by the CLG PPA consultation paper that ran under the title of 'a *new way* to manage large scale applications' (CLG, 2007c, emphasis added), described how PPAs initially emerged primarily out of the demands of developers and indeed encapsulated much existing best-practice in relation to project management from both private and public sector (e.g. R2). In an era where closer integration of formerly public and private sectors is

acceptable to all dominant political hues, it therefore seems that the rationale behind PPAs is tenacious.

Equally, as the benefits of PPAs are apparent to both developers and Local Authorities, it is logical to assume that in the face of market downturn it will be the overall number of applications that declines rather than the use of PPAs (e.g. P3). Although Local Authorities can charge for pre-application work under the 2003 Local Government Act, the certainty over procedural timescales, development requirements, and programme responsibilities that a PPA approach ensures for developers will continue to outweigh the costs incurred by not entering into such an arrangement regardless of market conditions. Furthermore, it appears that the cost to developers of entering into a PPA is minimal in relation to their overall turnover: the PAS officer interviewed relayed that one developer had quipped, 'I spend more on the volauvents at my topping-out party than I do on the planning fee' (P2). Nonetheless, developers are severing their involvement with numerous regeneration schemes- Centros Miller has, for example, pulled out of a second scheme that it was involved with in Lancaster, which may impact upon the case study presented in this work in due course (Urry, 2008). Whether PPAs will continue to operate within the mutable context of the planning system at large and more profound market and political factors still, will only ultimately be revealed in time, but it appears that PPAs are build on solid foundations rather than short-term whims.

5.3. The applicability of PPAs to eco-towns

Within the constraints of the current system, and providing irreparable damage to public opinion has not already been incurred in the eco-towns programme, the concept of PPAs might therefore beneficially be applied in order to attempt to ameliorate the shortcomings of eco-towns in regards public involvement. As *Section 2.2. Eco-towns programme* demonstrates how in technical terms eco-towns and the developments that PPAs were designed to consider are extremely similar, it is not so much a question of 'why' should PPAs be applied to eco-towns, but 'why not' (P4). The PPA process would itself directly promote more broad and profound public involvement than has manifestly been the case so far in the eco-towns programme, and also through establishing earlier and clearer interaction between developer and Local Authority perspectives mean that eco-towns would have regard to established Local Authority visions and policies in which the public, by statute, has been involved in the formulation. Care would have to be taken, however, to render the process

sufficiently transparent so as to avoid perceptions of Authority and developer collusion as occurred in the orchestration of 'Castleview', Lancaster.

Nonetheless, whether, owing to their sheer magnitude, eco-towns require a more dedicated approach is an unanswerable question as although interviewees anecdotally suggested PPAs had evolved to deal with different scenarios than the predominantly housing-led developments for which they were originally designed (e.g. P4 & P1), there is no consolidated information on how far PPAs have been stretched in implementation. As with the potential impact of changing market conditions and political imperatives, it appears that there is significant technical applicability and practical benefit to applying PPA principles to eco-towns, and although mooted in official circles (e.g. P3 & P4), only time and experience will tell whether this comes to fruition. The first CLG officer interviewed made the particularly pertinent point that asking such questions is perhaps premature 'I just wonder whether it's time yet... whether it should be done three years down the line' (P1)- this criticism, and others arising in the course of undertaking this work form the basis of subsequent and last project element.

5.4. Self-referential evaluation

Although this project isolated an issue central to contemporary issues surrounding the UK planning system and largely succeeded in realising the respective research methodology for broadening, deepening, and challenging established PPA evaluations, by virtue of the source-material available, its conclusions appear insufficiently definitive. This is perhaps more a failing of this type of endeavour- considering a factor that defies conventional or convenient quantification such as the quality of development outcomes as opposed to, say, the number of projects completed- than a failing of this project in particular: it has been noted that planning analyses are often 'data rich and information poor' (Carmona, 2007: 2). Additionally, it seems that this work is weaker through attempting to consider too many issues- although factors external to planning are crucial to the successful implementation of PPAs, perhaps a more concentrated focus on the practical application of PPAs would have concentrated research efforts to better effect.

Whether PPAs might beneficially be applied to eco-towns is clearly premised on a number of unsubstantiated premises: that communities should be involved to a more profound degree in the planning process, that there are the resources readily available to conduct considerable public consultation exercises, and that the Planning Authority will to do so exists. Therefore in working towards the premise of this work, numerous other issues that would benefit considerably from

greater critical attention have been uncovered: how are systemic resources limiting the undertaking of effective community involvement in the planning process? What does Government mean by the term 'community'? Does the public interpretation of community differ from that of Government?

10,713 words excluding abstract, figures, tables, bibliography, and appendices.

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7. Appendices

Appendix 1- Email proforma sent to prospective interviewees for research phase one.

[Recipient],

In the course of study towards my MSc Spatial Planning dissertation at UCL, you have emerged as a key individual to speak to in regards Planning Performance Agreements.

For my dissertation I have chosen to investigate how PPAs emerged, operate within the context of the UK planning system, and how effective they are as mechanisms for involving communities in complex developments. I would be enormously grateful were it possible to interview you about these policy instruments as your perspective and that of [organisation represented] would make an invaluable contribution to my work. Please find a skeleton outline of the issues that I would ideally like to discuss at the foot of this message, although feel free to mention any issues you think that I have omitted.

Many thanks indeed,

Tom Bristow.

I'd very much like to touch on the following six issues:

1) *Your involvement with PPAs*

2) *The context in which PPAs emerged* (how they came into being as a policy instrument, what pressures they responded to, the nature of problems in the planning system they sought to improve)

3) *The operation of PPAs* (do PPAs operate in practical terms as guidance suggests? Have they evolved in operation since their initial use? Are PPAs being used for different types of development than initially expected? Are they becoming an increasingly prevalent mechanism?)

4) *How PPAs involve the community in orchestrating major developments* (at what point are communities typically involved? To what extent are communities involved in the process? Are there tangible instances where community input has led to particular outcomes?)

5) *Whether existing analyses of PPAs have been effective* (have they asked the right questions? Received sufficient responses? Led to alterations in the operation of PPAs?)

6) *What influence contemporary planning, political, and socio-economic change has, and may have in the future, in relation to PPAs.*

Appendix 2- Reproduction of CLG PPA consultation responses

(responses are not transcribed in full from those received by CLG as this would have been needlessly time-consuming, rather only those points specifically relevant to this work's research aims have been noted in the table below).

Organisation type	Respondent code	Q1- Do you agree with the principle of having PPAs?	Q4- Do you think PPAs are the most effective way to ensure that Local Authorities and applicants/ developers devote sufficient resources to the delivery of decisions on significant major applications?	Q8- What are the likely effects of the changes on you, or the group or business of Local Authority you represent? Will there be any unintended consequences?
Environmental lobbying group	R1	Y- especially the early involvement by Environmental/ Utilities bodies and specific consultees		
Environmental lobbying group	R2	N	N- could prejudice passage of other applications	There would be more work for individuals, voluntary groups and NGOs, and less time in which to do it: this would be unfair in our view'.
Environmental lobbying group	R3	Y- although more detailed guidance needed	Y	Likely to be positive, although PPAs need to remain voluntary owing to resource burdens
Environmental lobbying group	R4	Y- 'RAB welcomes Planning Performance Agreements (PPAs) as a way of managing the relationship between the LPA and the local community; to secure a route to a planning decision which is more timely and which encourages cooperation and good exchange of information between LPAs and applicants... RAB has actively encouraged good community engagement between renewable energy developers, LPAs and the local community. They have commissioned and published <i>The protocols for public engagement with proposed wind energy developments</i> '		
Environmental lobbying group	R5	N- as the agreement is chiefly between LA and developer, means that third parties like English Heritage will have to be involved in a project they have had no influence in the creation of	For the reasons outlined in earlier responses, there appear to be a significant number of potentially complicating factors that English Heritage is concerned may outweigh the flexibility the proposals are trying to introduce;	EH is concerned that it will, on occasions, be drawn into negotiating on proposals that is does not believe are strategically important'- would cause a drain of effort from other areas.

Individual	R6	Y			
Individual	R7	N, 'Planning Performance Agreements which pay councils to speed up processes will be at the expense of fair and proper hearings as against 'trust and good communication' between developers and the LPA. The local authority's duties towards the rights and welfare of its residents- who are sometimes objectors whose lives or livelihoods might be adversely affected by a development- are not reflected in the White Paper's changes to the planning system'.			I have never had 'consultation fatigue', or know anyone who has. What everyone suffers from is 'post consultation fatigue': finding that the consultees' views are ignored if they are not the 'right' views.
Local Authority	R8	There are concerns that the community may view PPAs as an agreement between the authority and a developer to deliver an approval.'		N- all about got management, don't necessarily need PPA	The Council is of the view that PPAs could be received with suspicion by the community. Large applications are usually by their nature contentious'.
Local Authority	R9	Y		N- might create resource deficiencies elsewhere	drain of resources away from other aspects of planning
Local Authority	R10	Y- support in simple terms			
Local Authority	R11	Y			
Local Authority	R12	Y- given monitoring		N- dependent on LA resources	...the process assumes that the local planning authority, working in conjunction with the developer and being funded accordingly, will result in a smooth administrative process. Again political and public pressure can skew applications, particularly where planning committees are required to make decisions. Unfortunately large developments are not always welcomed by local populations'.

Local Authority	R13	Y, 'As a voluntary agreement between the LPA and developer, it should bring greater certainty to the time-scale and information requirement necessary for major and complex developments	N- they're only formal project management processes	The unintended consequences may be a perception of a two tier planning system where those developers prepared to pay additional fees to the LPA will obtain a better service than those who do not wish to do so. There may also be a public perception of developers 'buying' planning permissions and a perception from developers that they will be 'obliged' to sign up to an agreement and pay additional fees just to ensure their application starts to move through the system'. Council introduced c. 2001 a Major Development Protocol to establish responsibilities of Council and developers in the processing of developments of major significance- similar to PPAs
Local Authority	R14	Y 'The use of PPAs in principle is supported as the current 13 weeks target can lead to perverse outcomes when linked to the current Planning Delivery grant as LPAs can be pressed to refuse applications to meet the target or be pushed to accept poor quality outcomes. PPA should enable LPAs and applicants to focus on making decisions in a timescale that is relevant to the complexity of the application and to bring about higher quality of outcomes'		
Local Authority	R15	Y	Y	New skills in project management required (links to planning skills enquiry), 'One concern is that, where the proposal is controversial and likely to generate significant opposition from the public, the negotiation of a detailed timetable for determination will be seen as an indication of a bias towards the developer by the authority, which will make the determination process more fractious with the local public'.
Local Authority	R16	Y		

Local Authority	R17	Y- 'Bracknell Forest piloted Planning Delivery Agreements and has found the approach very beneficial in ensuring developers and all parts of the Council work in a more focussed manner'	Y- experience showed improved workflow	There is a risk that third parties could see the outcomes are guaranteed, the change from 'Delivery' to 'performance' will help in this respect and the PPA will need to be a publicly available document to ensure transparency'.
Local Authority	R18	Y	Y	
Local Authority	R19	Y	Y	
Local Authority	R20	Y	Y	PPAs need to be open and transparent to avoid third parties seeing them as guaranteeing outcomes... Perhaps there is a case for PPAs to be published on the statutory register'.
Local Authority	R21	Y- 'By engaging in such a participatory and positive process, it would be expected that the quality of development proposals would be significantly increased'	N- more important is the lack of skilled individuals, the lack of planners	Skills training will be required
Local Authority	R22	Y- 'The current timescale of 13 weeks to decide a major application has led to pressure to decide proposals prematurely, which can lead to refusals of planning permission on complex schemes that require negotiated improvements, or alternatively, local planning authorities being pushed to accept poor quality outcomes in order to meet their 13 week targets.'		
Local Authority	R23	Y- 'The introduction of Planning Performance Agreements would allow more realistic and robust timescales to be negotiated leading to a higher quality developments and advantages to the public, the local authorities and the developer'.		
Local Authority	R24	Y	Most local authorities are seriously short of resources for this type of function and would be reluctant to devote more unless there is a better outcome for them.'	The main unintended consequence would be third party perception of this process. Objectors to development would suspect collusion between the LPA and the developer, which would not be helped by the existence of payment for this process'

Local Authority	R25	Y- although the principles already operational, 'the formalisation of this good practice is therefore welcomed'	Y- 'To improve the effectiveness of PPAs, Cheshire County Council considers that PPAs should be made statutory, rather than introduce financial penalties'.	Cheshire County Council considers that additional expense may rise regarding the inception day, but this would be discussed individually on a case by case basis and money recouped where necessary. There may be staff resource implications depending upon the number and frequency of large scale major applications submitted, but Planners would also develop/ improve their project management skills.
Local Authority	R26	Y- although much of the content is already undertaken by the Council, 'PPAs would involve the formalisation of this established process'	N- 'There is a risk that the proposed regime will lead to applications subject to PPAs receiving preferential treatment over other major applications, particularly under the proposed charging arrangements'. '... it is essential that PPAs also ensure that sufficient resources are made available by statutory consultees, delays in receiving consultation responses can be a significant cause of delay in the pre-application process'	Additional resources burden
Local Authority	R27	N- 'PPAs could only be beneficial for a few of the very largest developments, and would have dis-benefits for the relatively small scale developments dealt with in a District such as Chiltern where all our countryside is green belt', additionally the speed of decision-making process in LPAs has improved since PPAs were first discussed, therefore largely unnecessary. Of more benefit is the working relationship, not formal procedure.	N- lack of experienced/ qualified staff	The main unintended consequence would be third party perception. Whether it is true or not, objectors to a development would suspect collusion between an LA and a developer, not the 'quasi-judicial' relationship that they would expect and prefer. This aspect should not be underestimated as trust is an essential element of the relationship between a local planning authority and its communities'.
Local Authority	R28	Y- only if voluntary agreements	N- 'The City has a good track record of determining a large volume of applications within the Best Value targets and this have been achieved without PPAs'- needs to be specific to locations, hence blanket statutory obligation would not be welcome	Must be no suggestion PPAs ensure assure permission, mustn't privilege PPAs over other developments, might deplete resource available in general
Local Authority	R29	Y	Y	There will be a perception by third parties that the outcomes are guaranteed. The PPA will need to be publicly available in order to address this point'.

Local Authority	R30	Y	Y- as they, contrary to existing practice which tends to blame LPAs more for failures in the process without developer reproach, PPAs sign up both parties to an obligation to do their part	
Local Authority	R31			
Local Authority	R32	Y- but safeguards need to be 'put in place against the establishment of a First Class and Second Class planning system. The efficient processing of large scale, major planning applications should not be at the expense of the attention given to all other planning applications'	N- it's all about project management not necessarily this structure	Resource diversion from other areas.
Local Authority	R33	Y	Y	cost and resource implications, issues with which applications take precedence
Local Authority	R34	Y		Need for all parties, LPA, developer, consultees, Go to be on board
Local Authority	R35	Y	N- 'East Dorset is not in a position to simply increase resources to meet a short term increase in activity arising from a large application.'	There are bound to be accusations made by third parties that there is a level of collusion with the applicant.'
Local Authority	R36	Y- 'They are a formal recognition of what is tending to happen anyway with major development schemes'	Y- 'We believe that they are an effective way forward. Importantly, they involve applicants in the process and hence acknowledge that the quality and timeliness of submitted information is an essential element in the planning process'	
Local Authority	R37	Y- 'Provided the impartiality of the local authority is not undermined through any implication that by entering into a PPA planning permission will automatically be granted'	Y	
Local Authority	R38	Y- but fear that the process will result in significant additional administrative costs for the LPA	N- lack of resources incurs the danger that 'there is a danger that the initiative will wither on the vine'	Whether it is true or not, objectors to a development would suspect collusion between an LA and a developer, not the 'quasi-judicial' relationship that they would expect and prefer.
Local Authority	R39	Y	Y	Collusion impression
Local Authority	R40	Y	Y- formalisation of existing processes	
Local Authority	R41	Y		

Local Authority	R42	Y- 'there is a danger that the process would impose significant additional up front administrative burdens on local authorities, with associated additional costs.'	N- 'Local Authorities are seriously short of resources (effectively experienced staff time) for this function and will be reluctant to devote more unless there is a better outcome for them.'	Whether it is true or not, objectors to a development would suspect collusion between an LA and a developer, not the 'quasi-judicial' relationship that they would expect and prefer/
Local Authority	R43	Y	Y, 'The critical element is the introduction of project management techniques to properly plan and drive the pre-application and determination process.... there is an urgent need for guidance on best practice application of project management in this area'.	
Local Authority	R44	Y	Y- ensuring all consultees are involved	LPA resource issues, and potentially the establishment of unrealistic time-scales
Local Authority	R45	Y	Y	There will be a perception by third parties that the outcomes are guaranteed. The PPA will need to be publicly available in order to address this point'.
Local Authority	R46	Y- 'The willingness of developers to engage at an early stage and undertake to deal with identified issues should improve the quality of proposals'	Y	More people would have to be drawn into the process of determining planning decisions- more resources.
Local Authority	R47	Y- Council already has procedures in place for major application handling		
Local Authority	R48	Y- provided the locality has a strong hand in discretion, 'PPA's must not be used to circumvent the local development framework process... furthermore more guidance needs to be provided on third party involvement (e.g. how well established residents associations would engage in PPAs).	No, PPA's will focus the minds of applicants and Local Authorities, however, in the experience of the London Borough of Hillingdon the reasons that large-scale developments may take a number of applications and/or appeals to gain an approval is two-fold; (i) 'Because developers fail to undertake proper pre-application consultation with interested third parties and the local community; (ii) Because of the failure in many cases of applicants to properly masterplan sites and to engage with the Local Planning Authority early enough when they are planning uses for sites'	...the Council is very concerned as to how PPA's would be perceived by the Local Community' especially third parties such as GoL or Environment Agency 'The Council might be more likely to use PPAs if clear guidance was produced by Central Government on how third parties, such as Residents Groups and Community Associations would be involved...'
Local Authority	R49	N- severe concerns over staff resources and how this all relates to BVPIs.	N- 'With limited resources at their disposal LPAs are unlikely to find PPAs the most cost effective means of allocating these to their best advantage in meeting BVPI 109a targets'	The most likely effect will be on resource allocation, given that these are already restricted. This in turn could inadvertently result in a delay in the speed in which those applications not subjected to PPAs are determined'.

Local Authority	R50	Y	N- adequate resourcing of the system as a whole needs addressing in order that all applications can be dealt with sufficient attention	
Local Authority	R51	Y- 'We support the proposed introduction of Planning Performance Agreements which we consider to be an extension of the best practice employed by this authority and a number of others in relation to major applications. In our experience this allows for proper consideration of resource allocation from both a local planning authority and a developer perspective and creates greater certainty for all parties, including statutory consultees'.		
Local Authority	R52	Y	Effective PPAs can be resource intensive smaller authorities may have difficulties in providing effective resources.'	Concern over potential conflict of interest, 'We believe that members may be able to be involved at a much earlier stage and this may impact on their role as Cabinet/ Committee member and as ward member'
Local Authority	R53	Y- Lambeth involved in pilot.		Particular concerns about how PPAs would work within the framework of London policy, 'In London this would need to take into account the proposed extended powers of the Mayor in the GLA Bill and applications taken over by the Mayor should not be included in a borough's BVPI 219 performance
Local Authority	R54	Y	Y- 'Yes. Experience in Leeds and other LPAs suggests that this will lead to more timely, predictable, high quality developments which are welcomed by the private and public sector alike and is a key to successful regeneration'	Unintentionally there could be a perception by third parties that planning permission will be automatically approved. It is [therefore] important to ensure transparency throughout the process'.
Local Authority	R55	Y- although 'Difficulties could arise, however, around public perception and partner relationships if negative determinations are looking likely or are probable...'	N- highly dependent on authority workload, i.e. the resources available to that project	Only minor changes envisaged in PPA used, and we are not sure what the take up would be. Overall it would make a procedure that we already frequently use slightly more formal'.

Local Authority	R56	Y	Y- 'They are an option which could be very helpful provided adequate resources are available within both the local planning authority and the developer team'.	Y- 'The process assumes that the local planning authority, working in conjunction with the developer and being funded accordingly, will result in a smooth administrative process. Again political and public pressure can skew application , particularly where planning committees are required to make decisions'.
Local Authority	R57	Y- Council already has procedures in place for major application handling	Y	Collusion- rectified through public availability of contract
Local Authority	R58	Y- 'although the process could impose significant additional administrative burdens'	N- 'Most local authorities are seriously short of resources for this type of function and would be reluctant to devote more unless there is a better outcome for them.'	The main unintended consequence would be third party perception of this process. Objectors to developments would suspect collusion between the LPA and the developer, which would not be helped by the existence of payment for this process'.
Local Authority	R59	Y- 'Manchester City Council already works to these principles on some major projects'.	Y- provided there's sufficient all-party buy-in, 'However, the focus should not just be the process and time taken, but the quality of the decision and the end product'	
Local Authority	R60	Y- 'Concerned that members of the public may see them as an agreement which will deliver an approval' suggests renaming to 'Planning Process Timetable'	N- 'No, they shouldn't really be needed as a good department should have good communication and project management skills. These skills should be used for every application. If the PPA breaks down this will cause problems and end up in a legal minefield'.	Consider that members of the public will see applications as a done deal, leading to suspicion or indeed unwillingness to send in their opinion'.
Local Authority	R61	Y	N	Y
Local Authority	R62	Y- in principle	Y- 'It is one way to ensure a development team approach to larger more complex applications. Medway already encourage pre-application discussions on more complex major developments... It is not clear from the consultation paper what the cost to business will be and if LPAs would have the resources to devote to the PPA as suggested'	The concern would be that the LPA is effectively entering into a contract with the applicant. This could place additional pressure on the planning service to manage expectations of the applicant'

Local Authority	R63	Y- 'This is a good idea which will help focus all parties on key dates. Already this has been partially implemented by virtue of the Council's now well established pre-application charging regime for all major category development'	Y- as 'timetables [are] mutually agreed between both parties concerned rather than imposed by the DCLG. This should help reduce the number of non-determination appeals on major category cases. However, greater clarification regarding potential for appeal against non-determination would be welcomed.'	The removal from BVPI 109a will result in a better quality process in determination. Also, will benefit those authorities who do not typically grant large numbers of major applications therefore don't receive large quantities of PDG.
Local Authority	R64	Y	N- other ways may be equally beneficial	The general public might consider that as a PPA is in place the granting of a planning permission is a 'done deal'. This has implications for the reputation of the Council and the transparency of the decision.
Local Authority	R65	Y- 'The Council currently offers and encourages applicants to seek pre-application advice and so informally currently follows a process similar to that proposed in the PPA's. Therefore a formalisation of that approach is not object to'.	N- PPAs may receive preferential treatment, also, 'to be effective other stakeholders in the process, such as other consultees have to be bound into it to ensure it is delivered'	Limited- the council doesn't typically deal with many applications of this level. Additional resources would be key.
Local Authority	R66	Y- The District Council has experience of a Major Projects Team approach to initiate pre-application discussions with developers and recognises the value of this process	Y- 'if the funding regime behind the PPA process can support the additional resources required by the local authority then yes. However the question fails to acknowledge the often crucial role of the external agencies and their ability to target appropriate resources'.	The experiences of the Major Projects Team operating in Kerrier has shown that the spirit of cooperative working proposed by the introduction of PPA's can be extremely beneficial for all parties engaged in such projects. Not only are working relationships reinforced by working towards a common goal the different parties benefit from gaining a better understanding of each organisation's perspective and objectives'.
Local Authority	R67	Y	Y	The main consequence will be to expose the significant resource issue required to serve the PPA approach and organise the wide ranging coordination of other bodies involved in the process. The PPA approach will set false expectations and potentially lead to dissatisfaction when LPAs are seen not to perform'.

Local Authority	R68	N- 'There is a real concern that if a PPA is in place it will lead sceptical members of the public to the inevitable conclusion that the developer is paying for an enhanced service with a guaranteed outcome of a planning permission. This perception is difficult to counter and could lead to the planning system being brought into disrepute in the eyes of many members of the public'. Nonetheless, early consultation is essential, and a potential means of allaying public fears would be to assure that any PPA developments already complied with established LDF processes.	N- the additional resources required by these proposals might be prohibitive	The integrity of the planning system may potentially be challenged- 'this is a fundamental issue which must be properly addressed'
Local Authority	R69	Y- 'The County Council supports the introduction of PPAs as a more efficient and effective means of handling major planning applications using a project management based approach.'	Y- 'However, many LPAs are seriously under resourced due to the difficulties in recruiting skilled and experienced senior planning officers. In such circumstances, LPAs would find it difficult to successfully implement PPAs. It will also be important to ensure that senior planning officers have the appropriate project management skills to successfully implement PPAs'.	It is considered that the introduction of PPAs for dealing with major planning applications will assist the County Council in targeting resources. It will help in the management of staff time and will formalise liaison with key consultees both at pre-application and application stages. This should speed up the process as we currently experience significant delays in receiving responses from certain consultees. It is also considered that the use of PPAs will assist in making the planning process more transparent to the public as there will be a clearly auditable process through from pre-application to determination with key issues identified at an early stage'.
Local Authority	R70	Y- 'This process of front-loading information requirements has been adopted by the Council in the past, and is a more realistic approach to deal with the more significant major development proposals. It ties in with the more project management approach to planning'	Y	PPA applications are likely to be given priority over other applications
Local Authority	R71	Y	Y- 'PPAs are unlikely to significantly increase the overall resources available within an authority, but they will promote a focussed approach to the use of existing resources	

Local Authority	R72	Y- 'Large scale developments are unlikely to meet standard BVPI 109a targets, and therefore it is better to accept that the proposal will take longer and positively manage it through an agreed plan, in the interests of both the applicant, the LPA and third parties. Greater certainty can ensure that submissions are not rushed to the detriment of the other party, follow a particular path specific to that particular case, and ultimately end with better outcomes than had the proposal been required to slavishly follow a pre-set determination period'	Y, 'Many of the issues of difficult relationships between applicant and LPA are through lack of clear commitment and direction, such that each can end up either not fully engaging, or running a different game plan that undermines the discussions when that party sees fit, i.e. the LPA suddenly decides to take the application for refusal or the applicant submits an application ahead of its full preparation. This is about approaching complex processes and decisions in a measured way, building long term and most importantly delivering high quality outcomes. Plymouth already encourages pre-application discussions to proactively manage a proposal and thus align resources accordingly'.	Better project management can ensure that resources are identified, consultees brought on side early, and a more constructive dialogue entered into between all parties- leading to higher quality and guaranteed delivery on the ground'.
Local Authority	R73	Y- although administrative costs/ additional resource burden needs to be carefully considered	N- 'Peterborough City Council is not in a position to simply increase resources to meet a short term increase in a activity arising from a large application. The primary problem will be finding the right resources in a timely fashion and at the right price.'	There are bound to be accusations made by third parties that there is a level of collusion with the applicant'
Local Authority	R74	Y- 'Planning Performance Agreements are also felt to be an effective tool and should be mandatory on all major applications'		
Local Authority	R75	N- concern resources would be unduly diverted towards PPAs. @major applications are inherently unstable and unpredictable in terms of complexity and handling times for different stages of the pre-application and application process' 'A PPA could also be a constraint on a Planning Committee's impartial consideration of an application as a pre-determined commitment for a decision timescale could deter impartial decision making on the planning merits of the application'	N- resource diversion towards PPAs	
Local Authority	R76	N		
Local Authority	R77			

Local Authority	R78	Y- given stringent monitoring	Y- 'They are an option which could succeed but this will depend very much on the resources available within the local planning authority'	Perception of collusion
Local Authority	R79	Y- 'The council welcome the opportunity to create a formal structure to deal with large scale proposals'	Y- 'They are an option which could succeed but this will depend very much on the resources available within the local planning authority'	... the process assumes that the local planning authority, working in conjunction with the developer and being funded accordingly, will result in a smooth administrative process. Again political and public pressure can skew applications, particularly where planning committees are required to make decisions. Unfortunately large developments are not always welcomed by local populations'.
Local Authority	R80	Y- given adequate monitoring	Y- 'The current performance monitoring encourages speed over quality of decision for all local authorities. Taking PPA applications out of this regime does not guarantee that the required resources will be made available, but should ensure that there is a commitment to do so'	The approach is cost-intensive, but does not suggest how costs might be recouped sufficiently'.
Local Authority	R81	Y		
Local Authority	R82	Y- in principle		
Local Authority	R83	Y- 'Through the BV109a regime and P.D.G. incentive regime, most authorities have already adopted project management techniques to address perceived performance inadequacies.' Rydale, has only received 2 applications in the last 6 years that would be classed as major under the current PPA guidelines	N- unknown	Limited in relation to Ryedale, although 'the mechanics of going through a PPA process- project planning- key issues lists etc, could be quite time consuming and often intensive, which if used on a regular basis, could have a disproportionate impact on the day-to-day running of smaller Local Planning Authorities.
Local Authority	R84	N	N- the existing system should be used	Insufficient information to comment
Local Authority	R85	Y, they 'will help to target resources, provide the opportunity for more realistic timescales and improve the quality of outcome.' 'The process may however result in significant additional up front administrative burdens on local authorities, with associated additional costs'.	PPA's appear to offer a sensible alternative to the current system which at present is very much focused on speed of decision rather than quality of decision'	Third party perception, 'Whether it is true or not, objectors to a development may suspect collusion between an LA and a developer'.

Local Authority	R86	Y- 'Over recent years the increased amount of information forming part of a major application and the need to consult widely has often resulted in the Council failing to determine these applications within the deadline'	Y	Under the current framework, planning applications are often submitted without substantial pre-application discussions, lacking adequate information and there is little time within the determination deadline to request further details, consult widely, obtain minor amendments and ensure the best possible form of development is achieved. Under the proposed system, much of the negotiation, community involvement, refining for the scheme and consultation with third parties can be carried out during the pre-application stage so that the planning application process itself is more streamlined'.
Local Authority	R87	Y	Y- although the power for charging for pre-application fees also needs addressing	
Local Authority	R88	Y		The knock-on effect of signing up to the PPA process may be to slow down determination of other applications as resources are diverted to deal with the PPA schemes. This was an obvious impact in the pilot study, where the applicants placed considerable pressure on officers handling the case and diverted them from other aspects of their caseload. Even if costs are reimbursed, obtaining additional experienced staff is problematic. The use of PPAs is therefore likely to be constrained'.
Local Authority	R89	Y		
Local Authority	R90	Y- particularly 'where there is integration between the corporate and strategic framework of the local authority to provide quality planning services'	Y- 'Agree in principle subject to maintaining appropriate consultation with the local community'	Without community involvement in the process, PPAs could be seen to lack transparency, and be considered as 'buying' planning permission.'
Local Authority	R91	Y	N- 'While the efficacy of PPAs is still open for debate, it would be worth applying them more widely in order to monitor their strengths and weaknesses. These points could then be built upon or replaced, depending on the results, so as to improve the effectiveness of this system'	Collusion accusation, insufficient resources, two-tier system potential

Local Authority	R92	N- PPAs were first considered in 2001 where the speed of decision making in planning was far slower than now [2007], 'The speed of decision making has improved immensely in the intervening period. Whilst it is more difficult to compare the quality of decision making between then and now, the introduction of PPAs will not necessarily in themselves bring about an enhancement in this. That will be brought about through a collaborative approach between the prospective applicants and the LPA'	Y		
Local Authority	R93	N- even with fees there's the danger that the process would impose significant additional up front administrative burdens, although such an approach could prove highly beneficial in relation to delivering major applications	N- 'Local Authorities are seriously short of resources (effectively experienced staff time) for this function and will be reluctant to devote more unless there is a better outcome for them.'	Third party perception- collusion between developers and authorities rather than the 'quasi-judicial' relationship that people would prefer.	
Local Authority	R94	Y- although capacity/ resource issues, 'the council further considers that there should be consultation on proposed PPAs with the local community likely to be affected by the proposed development'	Y	The Council is already building the project management skills of its staff who are involved in planning form major developments, and a reorganisation of its planning resources devoted to dealing with the larger major sites is in hand'. Resource issues, skill lacks. 'The recent experience of this council so far is that there is a very significant gap between the expectations of the council, as envisioned in its planning policy framework, and the quality of the product being currently offered by the volume house-builders'.	
Local Authority	R95	Y- although capacity/ resource issues, 'the council further considers that there should be consultation on proposed PPAs with the local community likely to be affected by the proposed development'	Y	The Council is already building the project management skills of its staff who are involved in planning form major developments, and a reorganisation of its planning resources devoted to dealing with the larger major sites is in hand'. Resource issues, skill lacks. 'The recent experience of this council so far is that there is a very significant gap between the expectations of the council, as envisioned in its planning policy framework, and the quality of the product being currently offered by the volume house-builders'.	
Local Authority	R96	Y- builds on Council's existing practice	Y		Resource diversion from other areas.

Local Authority	R97	Y				
Local Authority	R98	Y			Y- 'Whether or not they represent the most effective way forward is open to debate, but they appear to be an idea worth trying more widely'	
Local Authority	R99	Y			Y- 'a project management approach has long been seen as the best way to deal with complex applications'	It is anticipated that the development industry would welcomes the greater certainty in this process'
Local Authority	R100	Y			Y	This would put a further burden on the developer, particularly small businesses, with the need to plan ahead to arrange meetings and reports for the authority to consider. Members felt that the PPAs should be tailored to meet customer needs'
Local Authority	R101	Y- 'Good project management for large scale applications is good practice and this just formalises the approach with the applicant'			N- 'Local planning authorities are seriously short of resources, especially experienced planning staff to perform this function. Even with reasonable charges in place for pre-application discussions this is unlikely to result in sufficient revenue streams to staff up with experienced planners'	Third party perception. 'Whether is true or not, objectors to a development would suspect collusion between a developer and LPA, and would prefer to see the quasi judicial relationship in evidence'
Local Authority	R102	Y				
Local Authority	R103	Y- 'Even with a fee regime there is a danger that the process would impose significant additional administrative burdens on local authorities, with associated additional costs'			N- LAs seriously short of resources	Collusion rather than established quasi-judicial role
Local Authority	R104	N- 'Even with a fee regime there is a danger that the process would impose significant additional up front administrative burdens on local authorities, with associated additional costs'			N- LPAs seriously under resourced	Collusion rather than established quasi-judicial role
Local Authority	R105	Y- an effective means of delivering applications that should not be limited only to major developments			Y	PPAs and the procedure they represent must be totally transparent in order to ensure that the Community does not consider that a PPA means that there is a <i>fat accompli in terms of the outcome of the application</i> '

Local Authority	R106	Y 'PPAs offer a structured approach to dealing with very large development proposals with the potential to allow all parties to work together to achieve high quality developments within a timescale suited to the scheme rather than a centrally imposed timescale'	N- resource issues	Small authorities are likely to find it a considerable challenge to absorb the extra work associated from a PPA particularly if two or more come together'
Local Authority	R107	Y	Y	Resource implications are profound
Local Authority	R108	Y		the council is concerned that this process could involve additional officer resources, which may not be recoverable through the planning fee'.
Local Authority	R109	Y- Waverly has used PPAs, but 'it should be noted, however, that PPA's are not the only route that can be followed in ensuring the timely determination of planning applications, and flexibility in process and approach is therefore to be encouraged'		Collusion, but to counter this , 'the PPA will need to be publicly available and the guidance should make this explicit'
Local Authority	R110	Y - The Council's Major Project Team deal with applications already on a project based approach and this will assist in this process'	Y- 'the process can establish a realistic framework for determining applications. It will ensure that both parties put sufficient resources into the process as significant delays can also result on the applicant's side'	Resource drain from other areas.
Local Authority	R111	Y- 'Even with a fee regime there is a danger that the process would impose significant additional administrative burdens on local authorities, with associated additional costs'	N- 'Local Authorities are seriously short of resources (effectively experienced staff time) for this function and will be reluctant to devote more unless there is a better outcome for them.'	Third party perception of collusion rather than existent quasi-judicial interaction
Local Authority	R112	Y	Y	Third party perception of collusion, although public access to PPA documents would evade this
Local Authority	R113	Y		Given the proposal to remove Planning Delivery Grant in 2008, there is a possibility that some impetus for Local Authorities to strive to achieve targets may be lost.

Local Authority	R114	Y	Y- 'PPAs can play an important role in helping to ensure that the developer provides all of the information required to process a major application, to identify those who need to be consulted, to identify the issues it raises and help the LPA to process the application in a timely fashion. However, it will only help to ensure that LPAs devote sufficient resources to the delivery of decisions on significant major applications if the issues of providing adequate funding of the planning service and resolving the problems being faced by LPAs in recruiting qualified and experienced planners are addressed satisfactorily'.	Building on Westminster's existing practice, 'it is important to ensure the obligation is placed on both the LPA and the applicant equally to deliver their part of the agreement in terms of the quality of the scheme proposed and the time taken to process the application. Failure by applicants to meet their part of the agreement should not have an adverse effect on the LPA recorded performance'.
Local Authority	R115	Y- although 'Government should give applicants an incentive to enter into PPAs; an example may be that failure to do so would result in there being no opportunity to claim costs against a local authority at appeal'	Y	Resource burden, concentration on PPAs to the detriment of other planning decisions
Local Authority	R116	Y- provided the fee regime reflects additional burdens incurred by local authorities	N- Serious lack of resources	Third party perception as opposed to current quasi-judicial role
Planning related NGO Organisation	R117	Y- 'as a means to speed-up the processing of planning applications on large-scale major planning projects'		We consider that PPAs are unlikely to become widely used unless there are proper incentives for their use'

Planning related NGO Organisation	R118	Y- as 'a means of enabling a pragmatic agreement between applicants and local planning authorities about the reasonable process and duration for the consideration of applications... The PPA proposal represents a considerable step forward from the current 13 week 'majors' target regime, which places much of the negotiation of major proposals beyond the framework of the statutory target, providing less rather than more certainty to applicants, local planning authorities and communities'.	PPAs hold out the significant potential to carefully target resources to major applications'	The drafting and management of agreement might become 'a source of unjustifiable complication and delay'
Planning related NGO Organisation	R119	Y- should encourage greater consistency and clarity, therefore greater confidence on the part of the local authority		These should create greater confidence on the part of local authorities when negotiating terms of development, and should also reassure house builders around their expectations and long term planning'
Planning related NGO Organisation	R120	Y- 'there needs to be a very clear contractual statement about the level and quality of service that is being bought, and a very clear identification of a named officer responsible for performance of that service'		Should be a public document
Private sector developer or consultancy	R121	Y		It is considered that the schemes that will benefit the most from PPA's will be those that involve a large number of complex elements such as Environmental/Utilities Impact Assessment, public consultation and a higher level of consultees. It is therefore important that Planning Performance Agreement continue to be voluntary'.

Private sector developer or consultancy	R122	Y- in principle, 'AR supports PPAs because the current target timescale of 13 weeks in which to determine a major planning application is often unrealistic given the complexity and scale of the issues to be considered by the LPA'	Y, 'short of a legally binding contract which would result in a loss of flexibility and the possibility of legal remedies being sought to determine disputes with all the disadvantages and delay which would result, voluntary PPAs represent the best route to improvement'. 'It is not uncommon for statutory consultees to be extremely late in responding to applications with the result that the determination process is slowed down... these difficulties could be removed/ reduced if statutory consultees were included in the discussion about whether to utilise the PPA procedure and they were to become signatories also'	Public suspicion of collusion 'to combat this, PPAs should be operated with the fullest possible transparency'.
Private sector developer or consultancy	R123	Y- 'We agree that something has to be done to accelerate the planning process for large-scale major applications... for too long major applications have become bogged-down in procedure and burdensome regulation to the detriment of the UK'	Y- although resources are a key issue	Beneficial, 'although since this is a voluntary scheme, the take-up by local authorities is key to the success of the scheme'
Private sector developer or consultancy	R124	Y	Y- provided time limits and financial penalties are an assurance of efficacy	Developing a PPA is likely to be fairly time consuming for all parties. Our members would only seek to undertake these where the scale or complexity of a development would mean that the creation of a PPA would save time overall'.
Private sector developer or consultancy	R125	N		AWEL has argued against these proposals in its response to Planning Delivery Grant changes. It is difficult to envisage what advantages, if any, PPAs have and what would encourage wider local authorities or developers to enter into an agreement. In the experience of AWEL it would add a further level of negotiation at a time when the clear focus of the Housing Green Paper and Planning White Paper is on delivery.' penalties would be required to keep LAs from slipping on targets

Private sector developer or consultancy	R126	Y		It is considered that the schemes that will benefit the most from PPAs will be those that involve a large number of complex elements such as Environmental/Utilities Impact Assessment, public consultation and a higher level of consultees. It is therefore important that Planning Performance Agreements continue to be voluntary'
Private sector developer or consultancy	R127		Y- 'there appears to be some merit in the proposal in general terms, however, we are concerned that this is another bureaucratic hurdle to cross when submitting a planning application and are concerned about the time that will be taken to agree timescales'. 'Much of the delay in dealing with planning applications is the failure of statutory consultees to respond in an acceptable timescale.'	
Private sector developer or consultancy	R128	Y		Developing a PPA is likely to be fairly time consuming for all parties. We would only seek to undertake these where the scale or complexity of a development would mean that the creation of a PPA would save time overall''.
Private sector developer or consultancy	R129		Y- 'We support the Planning Performance Agreements as they provide certainty for the developer. We have entered into such an agreement with Amber Valley Council and found it to be beneficial'	

Private sector developer or consultancy	R130	<p>Y- should facilitate better dialogue and a better deployment of resources. 'An unintended consequence of the newly introduced best value 109a target regime has been that some local authorities have lacked adequate incentives for determining large applications within a reasonable time period once the 13 or 16 week targets had lapsed... [PPAs are] seen as an important factor for improving the development control process for large and complex planning applications', but for whom do they improve the certainty, for developers, authorities, or communities? 'PPAs are also seen as a valuable project management tool. With growing information demands facing applicants, PPAs will provide a forum within which applicants can be confident as to the information they will need to submit and consult upon in order to obtain the validation of a comprehensive planning application. As such PPAs have the potential to improve levels of certainty and quality in the development control process. Furthermore it should also contribute to the wider drive towards improving the project management skills of local planning officials'.</p>	<p>Y- 'from the pilot studies PPAs have been shown to be effective for establishing agreed processes and timescales to assist in the delivery of major projects. They can also focus attention on the resourcing issue but as formulated they cannot prescribe for it'- suggests a legally binding contract might be a better way of ensuring successful operation</p>	<p>Vitality important for statutory consultees to be a part of the process from early on. Care needs to be taken to stop the process becoming too bureaucratic, flexibility and simplicity should be key. Success will depend on commitment of parties- perhaps some stronger form of obligation would benefit this. 'The PAS/ Databuild pilot noted that engagement by statutory consultees had not improved during the piloted PPA process, w with one participant noting that 'CLG really does need to get these consultees more signed up and committed to the PDA (now PPA) is it's going to make a difference here'</p>
Private sector developer or consultancy	R131	<p>Y- they establish a framework of negotiation and could be a useful addition to the current ways of working</p>	<p>We can only wait and see...</p>	<p>Variety of outcome- 'where one is developing in a growth area where the aim of the authority is in principle to achieve a permission and it is in their interest to support proposals in principle there may well be a place for well structured PPA's, however, in other areas where the politics are different and development is not welcomed even though it is needed, the PPA will provide yet another set of issues which they may use to frustrate and delay development'.</p>
Private sector developer or consultancy	R132	<p>N 'We see no benefit to the minerals industry and potentially duplication of time and cost; along with a disproportionate impact on independent SME operators unless exempted'</p>	<p>Y- although 'Local authorities should devote sufficient resources, in terms of manpower, training and decision making procedures to ensure all applications are processed professionally'.</p>	<p>it is unlikely that minerals operators would wish to enter into PPAs</p>

Private sector developer or consultancy	R133	Y- 'Individual local authorities have been largely successful in applying current guidance and bringing forward reserves to maintain security of supply. However the length of time it takes to deal with planning applications, together with the resulting uncertainty is of concern to the industry. BCA believes that Planning Performance Agreements will not improve this situation and it supports the detailed response of the CBI Minerals Group'	Cites where problems isolated in the consultation document relates to the minerals/ construction industry (i.e. the failure of PPAs to effectively involve statutory consultees)
Private sector developer or consultancy	R134	Y- 'BCSC supports the Government's proposals for the introduction of Planning Performance Agreements to help streamline the processing of major applications, such as town centre regeneration schemes'	
Private sector developer or consultancy	R135	Y- 'The introduction of Planning Performance Agreements is also a welcome innovation as it will introduce more flexibility into the system and also set a clear timetable for the planning process. However, we would also like to see this system applied to some smaller schemes which may also benefit from it'	
Private sector developer or consultancy	R136	Y- although PPAs can only be effective if Local Planning Authorities fully embrace the concept and, in particular, are prepared to engage in meaningful pre-application discussions	Very eager endorsement, recommendation that statutory consultees be a signatory to PPA in the first place, flexibility and simplicity should be key, potential for a dual track planning system
Private sector developer or consultancy	R137	Y- 'Brixton support the principle of Planning Performance Agreements as a means of improving the relationship between applicant and planning authority in relation to larger development proposals.	Points to the fact that project management is important in the Private sector developer or consultancy but such skills may require fostering in the public sector

Private sector developer or consultancy	R138	Y- 'the CBI continues to consider the development of a more efficient and responsive planning system vital for attracting and sustaining investment in the UK economy', local authorities 'lacked adequate incentives to determine complex applications that would inevitably exceed the 13 week target'. But it's important that PPAs don't evolve as a process within a process, many LAs have developed effective pre-application engagement strategies and some have questioned whether a PPA would 'gold plate' existing good practice	The CBI feels that there may be a danger of overestimating the benefits of PPAs on the wider planning system. Given the voluntary nature of PPAs, applicants are only likely to agree them with high performing local authorities. One unintended consequence could be that high performing local authorities will continue to improve through a wide use of PPAs, whereas underperforming authorities will struggle to benefit due to unwillingness on the part of applicants to agree PPAs.
Private sector developer or consultancy	R139	Y- 'the Group welcomes the concept of PPAs as a means to speed-up the processing of planning applications on large-scale major planning projects'	
Private sector developer or consultancy	R140	Y- they should be strongly encouraged, 'PPAs would also, beneficially, give an 'upfront' structure (to both the pre-application and determination process) that would be more resource-efficient than the current 'ad hoc' and informal procedures adopted by some LPAs'. 'PPAs are also generally likely to be a helpful tool for engaging members at an early stage in the structured formulation of proposed major developments, without their involvement raising issues of propriety or conflict with an LPA Code of Conduct for members', but it's essential that statutory consultees are involved in the production of PPAs. Appropriate level of staff seniority involved with the project is key. PPAs should be publicly accessible documents- which ones of your case studies are publicly accessible?, look at the trouble I've had- ATLAS failed to respond to my request for-	Potentially highly useful project management tools

Private sector developer or consultancy	R141	N- 'The benefits of PPAs to applicants is less obvious. PPAs will be voluntary with no effective sanctions proposed in the event of non-compliance... PPAs will only be effective if they bind these consultees [outlined, for example, as English heritage, Natural England, Airport Authorities] into the process but it is hard to see how this can be achieved. We therefore fail to see how PPAs can be effective'	N- It's about resources, not necessarily processes	Key issue is having skilled project managers, 'we believe that they could detract from the focus on improving the overall performance of planning authorities. We do however believe that the key elements of proposed PPAs should be incorporated into good practice for all development control planning officers. Improved guidance and training is essential for processing all applications'. 'It is unlikely that mineral operators would wish to enter into PPAs'.
Private sector developer or consultancy	R142	Y		Fails to adequately address the role of statutory consultees, 'CoalPro's experience is that much of the delay in dealing with major planning applications is the failure of statutory consultees to respond in timely fashion, statutory consultees therefore need to be locked into the process.
Private sector developer or consultancy	R143	Y- as certain major developments such as those for energy infrastructure will fall outside the remit of the proposed Infrastructure Planning Commission, and that these developments could benefit from the approach	Y- broadly speaking, 'However, the PPA process is only likely to help where all parties enter into the process with the genuine intention of supporting the most effective planning and development process for a project. It will not help where any party has another agenda, such as to frustrate the process'.	E.ON would recommend that this and other new schemes are reviewed thoroughly for effectiveness and efficiency a maximum of three years after being enacted'
Private sector developer or consultancy	R144	Y- albeit with caveats		For the sake of clarity, is should be noted that we have assumed that the PPA proposals relate only to planning applications that are determined at the LA level and do not relate to 'Nationally significant infrastructure projects as defined in the government's Planning White Paper, where determinations will be made by the proposed infrastructure Planning Commission (IPC)
Private sector developer or consultancy	R145	Y- useful tool for LPAs to agree an extended time frame, 'upfront' structure to pre-application and determination process, 'PPAs would in addition benefit all LPAs in relation to more complex, e.g. mixed use and/or major regeneration schemes, as well as, more specifically, those LPAs with only limited experience of more major projects'	Y- 'Better use of resources should be evident particularly at the pre-application stage, but only providing that Government guidance requires other public bodies, statutory and other consultees al the be proactive and involved in the project plan'	the Government must also ensure stakeholder confidence, in that the longer term result of use of PPAs becoming widespread is not simply one of prospective applicants paying what is in effect a premium for having their PPA planning application determined more quickly than one that has no PPA'.

Private sector developer or consultancy	R146	Y- in principle, although 'However, given the degree of front-loading now required, the information required for Design and Access Statements and new requirements on validation, plus new proposals for higher fees, it is questionable what the PPA will now add. The need of PPAs suggests a lack of confidence in these measures which should, if operated properly, produce the same results without the needs for applicants to pay even more'		
Private sector developer or consultancy	R147	Y- 'JLP welcomes PPAs as a means to speed-up the process of planning applications on large-scale major planning projects'	Voluntary nature essential	
Private sector developer or consultancy	R148	Y		
Private sector developer or consultancy	R149	Y- 'We would have liked Government to be braver and more ambitious in removing some of the burdens that developers and local planning authorities currently face. There should be very clear targets that are set in Planning Performance Agreements and be linked to existing or new forms of Planning Delivery Grants'		
Private sector developer or consultancy	R150	Y- upfront rather than ad-hoc is clearly beneficial, but if statutory consultees are omitted from the Key Issues List then there's the potential for disaster, but staff seniority required, must be transparent documents, 'For all of these possible beneficial outcomes to arise from introducing PPAs, the Government must ensure that stakeholders have confidence in them, again from the outset. The longer term result of use of PPAs becoming widespread must not simply be one of prospective applicants paying what is in effect a premium, for having their PPA panning application determined more quickly than one that has no PPA.'	Y- although greater importance needs to be attached to input of third parties	Potentially highly useful project management tools

Private sector developer or consultancy	R151	Y- '...as a process that needs to be agreed to by both local planning authority and applicant it would seem there is little basis for objection to something which provides the opportunity of a more carefully planned and resourced project management approach to the handling of major planning applications	Y- 'an opportunity appears to have been missed to match resources available (including consideration of standard fee income) against resources required'- i.e. needs to be a stronger link between what's charged and what's delivered. There therefore exists the potential for 'the current informal arrangements entered into by developers to fund, say, additional officer time continuing alongside the increased fee targeted at full cost recovery'.	The mix of costs of preparation and costs of implementation is potentially confusing. The voluntary aspect of a development is key as in some cases the costs recouped through a PPA will exceed its establishment/ use, whereas this may not always be the case- the option to adopt a PPA is therefore essential
Private sector developer or consultancy	R152	Y- 'PRUPRIM welcomes the concept of PPAs as a means to speed-up the process of planning applications on large-scale major planning projects'		Must remain voluntary, response of third party agencies promptly is essential
Private sector developer or consultancy	R153	Y		It is in the interests of the industry and the Government in the achievement of its objective to deliver 3 million new homes by 2020 to have an efficient and effective planning system and PPAs may have an important role to play in that process'.
Private sector developer or consultancy	R154	Y- 'It is considered that the schemes that will benefit the most from PPA's will be those that involve a large number of complex elements such as the Environmental/ Utilities Impact Assessment, public consultation and a higher level of consultees. It is therefore important that Planning Performance Agreements continue to be voluntary'		
Private sector developer or consultancy	R155	Y	Y- 'with the right resource and commitment from the main parties they can provide the best way of dealing with complex planning applications'	Importance of voluntary nature and the involvement of statutory consultees.

Private sector developer or consultancy	R156	Y- 'However we are concerned that attention is being given to improving the efficiency of this part of the process whilst overall performance is frustrated by poor delivery, post determination'	Y- 'In the current climate of under resourced planning departments, PPAs can potentially be one of the most effective ways of dealing with major planning applications adequately.'	...it is essential that the negotiation of PPAs does not in itself become a barrier to progressing development proposals' ; 'If PPAs are structured correctly, are not overly bureaucratic and can demonstrate positive outcomes then the development industry is likely to embrace them enthusiastically. Unintended consequences such as poorer service on non-PPA applications must be rigorously guarded against', It is more likely that the most efficient LPAs will actively promote PPAs and arguably it is the less efficient ones where their positive impact will be most felt'
Private sector developer or consultancy	R157	Y- 'As voluntary agreements PPAs are likely to be useful tool in relation to the more complex developments such as mixed use and/or major regeneration schemes. However it is important to recognise that unforeseen matters do arise during the application process that take time to overcome. The guiding principle should therefore be the need for high quality engagement...'	Y- particularly at the pre-application stage	Important to ensure time is not wasted in agreeing a PPA, calls for greater determination and flexibility
Private sector developer or consultancy	R158	Y- 'Large scale major applications are frequently a problem as they are more complex and naturally take local planning authorities longer to process.'	Y	
Private sector developer or consultancy	R159	Y		
Private sector developer or consultancy	R160	Y	Y	

Private sector developer or consultancy	R161	Y- 'We believe that they could best be utilised for very large scale development projects that require the coordination of a number of third parties and outside bodies' 'However, we would not want the very process of trying to agree a PPA to introduce further delay into the planning process'	Y- 'PPAs are considered a very effective tool for establishing agreed processes and timescales for the delivery of major projects and the process can result in the sharing of resources, ensuring very high levels of efficiency between applicants and LPAs'.	...there should be a tangible benefit rather than additional cost to applicants who enter such agreements. Similarly LPAs should recognise the benefits of a PPA and should expect to bear some of the costs associated with the setting up of the agreement. 'The potential for PPAs to lead to a better planning process and the formalisation of the pre application phase of major projects is considered not only to be beneficial for both the house building industry and local government but also on the achievement of the Government's housing targets.'
Public body (not Local Authority)	R162	Y- if continue to be voluntary		For both developers and local planning authorities, the targets for the determination of major planning applications often do not take in to account the importance of a proposed development and artificially apply unnecessary pressure where the quality of the outcome in terms of economic development or other material factor is more important to the main parties and other stakeholders than the speed with which the decision is issued. IN such circumstances, the main parties can find themselves pressured to deal with matters too quickly; for example, it is in the interests of the main parties to have appropriate and sufficient time to negotiate on a development proposal or s.106 agreement... A clear Project Plan at the outset will serve to inform the main parties and statutory consultees and stakeholders of the timescales and opportunities for engagement, allowing them to mobilise resources and direct their activities at the most appropriate time'

Public body (not Local Authority)	R163	Y- 'The introduction of Planning Performance Agreements as a project plan framework should contribute to a more collaborative and transparent process in the determination of major planning applications... it is important therefore that the opportunity to consider all of the issues that are likely to arise during the consideration of an application should be the part of a planned and integrated process'			
Public body (not Local Authority)	R164	Y, but with a number of issues			Change name to planning process agreements to remove implications of performance measurement, and use of PPAs extremely selectively (for 'major') applications or those with strategic significance
Public body (not Local Authority)	R165	Y- 'we are supportive therefore of the project management approach to dealing with large-scale applications, as long as it is seen as an opportunity to fully assess all potential problems, and not just to obtain a quicker decision'		Y- given greater input from the start of third party consultees- key as these organisations have to commit resources to projects they had no say in the inception of	Positive effects provided early involvement, 'we hope to be able to push for more enhancements at the outset, rather than trying to retrofit them to submitted planning applications. 'PPAs are likely to mean more meetings/ commitments/ expectations at a time when existing resource requirements within the Environment Agency are already stretched, and we will have to prioritise our planning input to our agreed priority matrix'.
Public body (not Local Authority)	R166	Y		Y- 'They appear to be an effective way to improve the efficiency of delivery of large-scale planning applications but will not in themselves overcome blockages in the system, e.g. availability of resource'	HSE is likely to be involved early- both a positive factor and an additional resource burden
Public body (not Local Authority)	R167	Y- in principle			HSE's proposed response raises the concern that given our current level of resources, we may not be able to meet the commitments'
Public body (not Local Authority)	R168	Y		It is recognised by the HA that the complexity of large applications can bring forward issues which can unnecessarily protract the length in which they take to pass through the pre-application and application process. Any such framework that seeks to improve upon such a process is welcomed by the HA'	Resource implications related to increased involvement

Public body (not Local Authority)	R169	Y- 'However, PPAs are not the only route that can be followed to ensuring the timely determination of planning applications, and flexibility in process and approach should be encouraged'	There may be a perception by third parties that the outcome is guaranteed through the entering into a PPA by the applicant and local authority. To counter this, the PPA will need to be publicly available and the guidance should make this explicit'
Public body (not Local Authority)	R170	Y- 'The Agency welcomes this proposal in principle. It will enable local authorities and developers to agree a project plan for the determination of applications for larger development, as opposed to the arbitrary imposition of the 13 weeks target'	
Public body (not Local Authority)	R171	Y- looks good on the surface of things, but needs supplementary guidance to be effective	It is recognised within the White Paper <i>Planning for a Sustainable Future</i> that there is a severe shortage of planning staff at Local Authority level. There is therefore a major possibility that the Planning Performance Agreement system could simply result in overload at Local Authority level. Provision must be put in place for recruitment of additional planners alongside provisions to ensure that applications being processed through the system; having been removed from the 13 week determination target deadline, are not allowed to 'collect dust' on the desks of overworked planners, or are simply refused on the basis that they are out of time'
Public body (not Local Authority)	R172	Y- strongly welcome greater pre-application involvement as currently involved in less than 2% of all applications at the pre-application stage	Resource issues, especially costs and capacity, potential increase in bureaucracy, and the risk that delivery of PPAs for large-scale developments will be at the expense of other developments
Public body (not Local Authority)	R173	Y- provided that the issue of design quality is embedded within such agreements	Clarity required as to the role of CABE within the PPA process, the involvement required and the status of this involvement.

Public body (not Local Authority)	R174	Y- 'the principle of a structured performance led process is desirable to ensure a consistent and structured approach to major planning applications'	Y- although scepticism about the voluntary nature of PPAs and lack of prescriptive Government guidance in certain areas, particularly in relation to a) appropriate consultations to assess impact on key public services, 'guidance on prioritisation of claims on limits s.106 funds, to ensure a broader cross section of needs are considered, cross referenced to community strategies, and not just traditional district/ county items, and a more mandatory approach to ensuring design and access statements specifically addressing designing out crime' LDFs consistently under emphasizing community safety related matters	
Public body (not Local Authority)	R175	Y	Y- 'They are clearly a potentially effective way of ensuring sufficient or increased resources are allocated. Local planning authorities should also be enabled to set their own scales of planning application fees reflecting the complexity of their areas'	The London Thames Gateway Development Corporation will benefit particularly from the introduction of PPAs, subject to the amendments suggested in the above consultation responses. This is because the Corporation only handles applications above thresholds of 50 residential units and 2500 square metres of commercial floor space with many being significantly above that level and the proposed PPA thresholds set out in the consultation part'
Public body (not Local Authority)	R176	Y- 'They provide the opportunity to increase the certainty of delivering key milestones within PUSH' Business Plan relating to the development of strategic sites, such as Strategic Development Areas and urban extensions'.		

Public body (not Local Authority)	R177	Y- Planning Performance Agreements enable local planning authorities and applicants to focus on making decisions in a timescale that is relevant to the complexity of the matter before them and to being about higher quality outcomes	N- the threshold should be lowered	The current target timescales of 13 weeks in which to decide a major application has led to perverse outcomes, when linked to funding measures for local planning authorities. Planning authorities can be pressed to decide proposals in 13 weeks, leading to a refusal of planning permission on complex schemes that require negotiated improvements. Alternatively, local planning authorities can be pushed to accept poor quality outcomes in order to meet their 13 week targets. Additionally there's the issue of third party perception, 'Objectors to developments would aspect collusion between the LPA and the developer, which would not be helped by the existence of payment for this process'.
Representative Body (civic)	R178	Y- provided third party groups are brought in early in the process		
Representative Body (civic)	R179	N- 'We consider that any private arrangement of this nature must prejudice the general work of a planning department. Unless arrangements were made for the hiring of additional staff or a consultant, it is difficult to see how even the most efficient department could undertake such a task. We do not therefore agree with the proposal'.		
Representative Body (civic)	R180	Y		
Representative Body (civic)	R181	Y- 'We see no reasons why large scale developers should not be allowed to enter into agreements with the council to pre-determine the time scale of their application's determination'		Involved in a number of large development projects recently

Representative Body (civic)	R182	Y- "All the proposals for setting up, managing and costing of the implementation of Planning Performance Agreements are supported by NORA members, since such a system is more likely to ensure that all salient points are discussed and solutions to problems presented by both applicants and planning departments before a planning application is made. To regularise the process must make it easier to progress through the necessary stages of the planning system'.		NORA supports the principle, but it concerned that the community itself should not be excluded from the initial stages of the process- should include residents, commerce, industry and traders, and their representative organisations. 'The views of the community likely to be affected and even involved in the major development are important and may be vital to the ultimate success of the venture. Their views may be constructive rather than critical and could even improve the likely success of the proposals. If, on the other hand, the community is not adequately consulted, not only may subsequent stages of the planning process be impeded, but also dissatisfaction and even anger can be generated of that the development starts off on a bad foot'.
Representative Body (civic)	R183			
Representative Body (civic)	R184	Y- provided PPAs form a level playing field between LPA and developer	Y- "There do not seem to be many better ideas around"	Perception of collusion, planners may get caught up in processing major applications and as a result covertly hostile to objectors, smaller projects may become starved of resources

Representative Body (Private sector developer or consultancy sector)	R185	Y- although needs refinement	Y- within the constraints of the present system	<p>We anticipate an overall improvement but do not have wide enough experience to comment in detail. Out experience of the (similar) scheme of charging for pre-application consultations is very poor. Local planning authorities do not seem to have any grasp of commercial realities or of the need to provide a reasonable service within time limits if that is what is being paid for. Successful operation of these kinds of system will require a 'sea change' in the outlook and procedures of local planning authorities'</p>
Representative Body (Private sector developer or consultancy sector)	R186	Y- 'NECC believes the current planning system to be littered with inefficiencies, and a drag on the competitiveness of the UK economy. A shift in emphasis is needed from controlling to enabling development		<p>The...targets for planning decisions have produced perverse consequences. These include a tendency for officers to reject applications on technicalities to avoid missing the deadline (or to recommend that the application is withdrawn and resubmitted as the 'free go'); and an exacerbation of delays on complex developments as once the deadline has been missed, any incentive to resolve the application quickly disappears. Planning Performance Agreements could help overcome these issues if a suitable national framework is put in place to ensure their effective operation.'</p>
Representative Body (Private sector developer or consultancy sector)	R187	Y- 'Any process that ensures that there is early thinking about how a large-scale major planning application is going to be managed by the relevant public authorities can only be beneficial, 'Experience has shown that early collaboration by the prospective developer with the regulatory authorities ensures a swifter and earlier passage to decision	Y- as it ensures effective project management	<p>It has been suggested that use of PPAs with a concentration of resource may disadvantage the processing of other lesser planning applications but this is considered to be unfounded based on a misapprehension as to the use of PPAs; they are a project management tool that should enable more structured administrative planning and use of resources'. 'An unintended consequence may be a realisation that the PPA approach is capable of being used for all but the most minor applications'</p>

Representative Body (public sector)	R188	Y	Y- although the critical element is the effective use of project management techniques- there is an urgent need on how to introduce this	It will be important to ensure the obligation is placed fairly and equally on the LPA and the applicant to deliver' and that failure to deliver on the part of the developer should not impact on the LPA's performance indicators. 'The process must be transparent and pre-application engagement with the community should be incorporated into the process'
Representative Body (public sector)	R189	Y		Not a major concern
Representative Body (public sector)	R190	Y - 'this enables the borough and developers to better clarify what is proposed, specify information required to assess the application, along with design, consultation, timeframe and s106 issues at the very outset of any development proposal. Developers are made aware that such meetings do not guarantee application success'.	Y- 'those boroughs who already undertake pre-application planning have provided positive feedback on the improved quality of planning applications and the better use of planning resources'	Developers recognise the benefit of discussing planning issues at the outset of a development with all relevant borough officers/ managers as it helps to clarify any possible contentious issues, for example: - the borough gets to identify where wider strategic links for infrastructure and services can be made, - key stakeholder and consultation issues, -possible amendments to the design and concept of the development proposal. Developers get more personal service, and often have a planning officer assigned to their application from the outset, developers tend to consult the wider community earlier on major applications, building greater community engagement in the planning process; and boroughs are able to negotiate better s.106 agreements with developers as such issues are discussed up front and developers can submit more detailed and thorough planning applications. London Borough's that offer a pre-application planning advice process are effectively already operating planning performance agreements, with the full costs being borne by the applicant. The only difference with this system is that once the application is lodged it is processed as any other application. However, given that the application would already have been partially assessed before being lodged (although informally) the quality of the application is likely to be more thorough and therefore be processed more quickly'

Representative Body (public sector)	R191	Y- as currently there is no obligation for emergency services to be informed in the pre-application stage of developments		Positive' there needs to be a requirement for the impact on policing service delivery to be assessed during the pre approval stages, either through legislative requirement or general Communities and Local Government policy', but resources for participation are a key issue- APA suggests a way round this would be to allocate a proportion of the amount developers are charged for pre-application discussions to third parties to permit their involvement. 'Policing, and emergency services in general provide the basic support structures which enable communities to thrive in a safe and cohesive manner and the importance of accounting for those services in the planning process cannot be understated'
Representative Body (public sector)	R192	Y- 'Large scale major applications are atypical for most Local Planning Authorities. They consequently are not used to dealing with them. They should be dealt with in a team and partnership approach'	Y- given review is possible	An unintended consequence might be that the failure to consult on an application of this magnitude in the pre-application stage could then count again that application/ development.
Representative Body (public sector)	R193			
Representative Body (public sector)	R194	Y- although less effective in certain cases (such as minerals and waste), 'The Society acknowledges that Planning Performance Agreements can be an effective mechanism to the determination of planning applications, and was supportive and fully engaged in the piloting of the process.' Flexibility to be highly encouraged	Y- 'PPAs can be effective in ensuring that local authorities and applicants/ developer devote sufficient resources to the delivery of decisions on significant major planning applications'	There may be a perception by third parties that the outcome is guaranteed through the entering into a PPA by the applicant and local authority. TO counter this, the PPA will need to be publicly available and the guidance should make this explicitly'.
Representative Body (public sector)	R195	Y	Y	There may well be an increase in the level of consultation requests we get, but that is a welcome principle'

Utilities, minerals, waste group	R196 or	Y- useful tool for LPAs to agree an extended time frame, 'upfront' structure to pre-application and determination process, 'PPAs would in addition benefit all LPAs in relation to more complex, e.g. mixed use and/or major regeneration schemes, as well as, more specifically, those LPAs with only limited experience of more major projects'	Y- 'Better use of resources should be evident particularly at the pre-application stage, but only providing that Government guidance requires other public bodies, statutory and other consultees at the be proactive and involved in the project plan'	the Government must also ensure stakeholder confidence, in that the longer term result of use of PPAs becoming widespread is not simply one of prospective applicants paying what is in effect a premium for having their PPA planning application determined more quickly than one that has no PPA'.
Utilities, minerals, waste group	R197 or	Y- 'The consent process for large projects requires planning, management and the appropriate allocation of resources by both the developer and the local planning authority (LPA) which could usefully be addressed through a PPA in many cases'	Y- 'it has the potential to be the first stage in ensuring that sufficient resources are devoted to major projects. However, it will be necessary for LPAs to increase the availability of resources and it is impossible to predict how successful this will be, especially if the consequence is an increased use by LPAs of external consultants to assist with the assessment of major applications'	There is a concern that the PPA process could limit flexibility for the developer to consult with the LPA at the start of a project. It is important that the probably need to set up a PPA if the project proceeds and concerns about cost implications for the developer do no inhibit discussions, and that the process of setting up a PPA does not delay preliminary discussions... The PPA initiation process must be streamlined so that it itself does not introduce a new delay', 'PPAs may have the side effect of increasing local authorities' use of consultants to assess major applications. This would introduce an additional party to the process with its own agenda, and potentially a commercial incentive to expand its brief, which the LPA may find difficult to resist especially in the context of potential later legal challenge.
Utilities, minerals, waste group	R198 or	N- 'The QPA is not convinced that voluntary agreements as proposed will provide greater certainty with regard to the speed and quality of mineral planning application assessments and decisions.'	N- voluntary agreements will not ensure sufficient resources are made available. Applicants/ developers have no control over the resources devoted to the delivery of decisions which is solely a local authority responsibility. The role of the applicant is tightly prescribed by statute in terms of the standard of the application that must be submitted and this in turn ensures that the applicant must commit sufficient resources to producing the application'.	Overall we are concerned that PPAs would shift the focus of the MPAs away from ensuring that sound decisions are made and towards matters of process and timing'.

Utilities, minerals, waste group	R199	Y- 'Wessex Water welcomes these proposals as a means of improving the process for navigating complex schemes through the development control process'	Y- although 'it is essential for the successful delivery of PPAs that authorities abide by the spirit of the new proposals and do not simply enter in PPAs in name only', additionally PPAs must not suck resources away from other areas/ applications	Involvement with statutory consultees (e.g. Natural England, Environment Agency, English Heritage etc.) should be made compulsory in the PPA process, to ensure that information and guidance from these bodies is incorporated at all stages of the application.' 'The involvement of statutory consultees will also help to mitigate the impact of having multiple consenting regimes applicable to applications (e.g. pollution control) by improving communication between parties and avoiding the unnecessary duplication of information'
Utilities, minerals, waste group	R200	N- 'The key elements of proposed PPAs should be incorporated into good practice for all development control planning officers. Improved guidance and training is essential for processing all applications'. 'It would appear that there are benefits to Mineral Planning Authorities (MPA) as this would provide additional funding for project management and exclude the application from the Best Value Target 109.' Benefits to an applicant less obvious as in relation to minerals largely dependent on binding in statutory consultees	N- points to issues within local authorities- very interesting. That planning will always take a back seat essentially, 'until the profile of the planning service is raised within the Local Authority structure and hierarchy'	Effective double-payment to have the application processed, and those that chose not to go down the PPA route may receive a weaker service, 'I cannot envisage a circumstance where this Company would chose to enter a PPA when the proposed increase in planning fees would make the whole process even more extortionate'
Utilities, minerals, waste group	R201	Y- PPAs would be especially useful in sites which fall in a number of administrative jurisdictions	Y- 'Without direct experience it is difficult to comment, however, it does seem that it would not only address resource issues, but also better co-ordination and identification of responsibilities'	Thames Water already follow the PPA process in principle in relation to major infrastructural developments, particularly in relation to the pre application stage and this has generally worked well on an informal basis', guidance on the amount Las can charge for pre-application work would be welcome, risk that if PPAs are introduced, LPAs may try and encourage their use in place of informal consultations and this is likely to increase costs, resource implications as well if statutory consultees are not involved in the initial PPA establishment.

Utilities, minerals, waste group	R202	Y- 'although anyone conversant with project-management procedures would expect a similar plan with minimum requirements and milestones etc. to be developed for any piece of work, however large'.	N- 'The consultation offers no alternatives, thus it is not possible to compare evidence and propose which is best'	We are concerned by the content of this consultation document which seems to repeat itself, but ultimately fails to provide the reader with sufficient information with which to answer the questions', suggests that the consultation document is deficient as it provides only a cursory review of the project outcomes and only positive findings. The partial regulatory impact assessment is of particular concern We consider that it barely complies with government guidance. It would appear to be an extremely cursory exercise that either did not really investigate the issues of importance, or didn't represent them in the document'
Utilities, minerals, waste group	R203	Y- in principle	N- 'We think a project management type approach should in general terms, be applied to all planning applications. Working towards relevant 'milestones' such as dates for sending out consultations, receiving consultations, meetings with the applicant and other stakeholders, committee report writing deadlines and the like should be a routine part of running an efficient development control service. Indeed, some local planning authorities (or individual officers) do appear to work in such as way and could perhaps be held up as good examples'.	Although PPAs mayn't be the most effective means, the result anticipated is positive. As regards PPA Charters, if these are going to set out the LPA's expectations for community involvement and how the LPA will engage members, this must be flexible enough to be adapted to individual circumstances. For example, sometimes the timing and scope of liaison with the local community can be affected by progress on commercial negotiations or technical research. Local government election cycles can also be a relevant factor'.
Utilities, minerals, waste group	R204	Y- although there are issues in relation to the interaction between PPAs and minerals/ waste developments	N- 'ESA urges the Government to ensure that a project management approach is more widely applied across the processing of all application types and not just those accompanied by a Planning Performance Agreement'	We also suggest a system to monitor and report on the effectiveness of Planning Performance Agreements and the dissemination of best practice'

Appendix 3- Email correspondence in relation to PPA case-studies for research phase three

[recipient name],

It has emerged in the course of my research that you are the key individual in [recipient organisation] to get in touch with in relation to [project name], as I'm currently undertaking a dissertation at UCL deepening existing research into the effectiveness of Planning Performance Agreements in involving communities in developments. I'd be enormously grateful if you could possibly help me in this work as [recipient organisation's] work appears to be a highly interesting issue, especially in relation to community involvement in the process.

Essentially I'd be very grateful to get your perspective on the following five matters:

1- At what stage is the PPA currently at? Has a decision on the relevant proposal been reached? Has the PPA ever been drafted into a formal document, and if so, is it publicly accessible?

2- Whether you now feel that the PPA was an effective tool? If large-scale applications are brought forward in [location] in the future will you encourage a PPA approach? Has [location] gone on to develop a PPA charter (i.e. standard protocol for establishing PPAs)? What limitations existed/ what could have made for a better process?

3- Would a PPA have been used for the same development in the current/ worsening housing market situation? Were developers as keen to employ the PPA framework? (I understand that this is perhaps unanswerable, but it's ultimately looking to consider whether PPAs will continue to be used in all market conditions)

4- Did the PPA enhance/ 'add value' to the process of community involvement? Were communities involved earlier? Were innovative approaches employed and hard to reach groups targeted? Was the outcome different, tailored to the community's needs, to how it might have been had community input been lessened?

5- Anything else you'd like to comment about the process, or any links to related documents that I should look at.

Thank you very much indeed for taking the time to look at this e-mail, and in prospect of any reply. Feel free to comment on any of the issues as much or as little as you see fit.

Kind regards,
Tom Bristow

Appendix 4- Lancaster City Council/ Centros Millers Draft Planning Delivery Agreement

DRAFT PLANNING DELIVERY AGREEMENT

Between Lancaster City Council and Centros Miller

In relation to:- CASTLEVIEW, LANCASTER

This draft document sets out the Local Planning Authority's commitment and expectations in relation to working together with the developer on this project. It has been prepared by the Council's Corporate Scheme Champion, Andrew Dobson, Head of Planning Services and the Developer's Scheme Champion, David Lewis, Associate Director, Centros Miller.

The Agreement will comprise a number of separate documents prepared jointly between the parties.

- The Planning Delivery Agreement Charter
- The site specific PDA Protocol
- The PDA project plan and programme

The overall aim will be for each party to draft the parts of the documents most relevant to them, then for agreement to be reached between the parties about content and delivery targets.

Signed
Andrew Dobson
Head of Planning Services
Lancaster City Council

Signed
David Lewis
Associate Director
Centros Miller

THE LOCAL PLANNING AUTHORITY'S PLANNING DELIVERY AGREEMENT CHARTER

- 1 Lancaster City Council is the Local Planning Authority. The City Council is advised on planning matters by its Head of Planning Services with Corporate Management team direction from the Corporate Director (Regeneration)
- 2 Where major development schemes are deemed to be in accordance with the Development Plan for the area, or as a departure, are deemed to warrant the full support of the Local Planning Authority for being in line with Corporate Objectives or an emerging replacement Development Framework, the Local Planning Authority will instigate a Development Team approach to undertake negotiations
- 3 For the purposes of clarity, where a scheme is in conflict with the Development Plan, or in the opinion of the Head of Planning Services does not merit support as a departure, there will be no obligation on the part of the Local Planning Authority to engage in a Development Team approach to the scheme
- 4 The make up of the Development Team will be determined by the Head of Planning Services on a case by case basis. A lead officer will be determined. This may sometimes be the Head of Service for schemes of major corporate importance, but in other cases a senior member of the Development Control staff will undertake this role
- 5 Key statutory consultees will be asked to join the Development Team where required. Such arrangements to be made by the Head of Planning Services
- 6 The City Council and its Committees, representing the wider public interest, are the sole specific clients of the Head of Planning Services and his team. In this context the team will be undertaking negotiations on behalf of the City Council and in the wider public interest to secure the best quality scheme delivering the full objectives of the Development Plan and other relevant policy documents. For clarity the developers, or any emerging objectors and interests groups will be deemed to be pursuing their own private interests unless their objectives are demonstrated to align with the wider public interest
- 7 The Head of Planning Services and his team will express their own professional opinions at all times in line with the Royal Town Planning Institutes code of practice. These opinions will be aimed to guide the developers to prepare a planning application that meets the policy and technical objectives required by the City Council. They will be given in good faith, but do not bind the elected Members of the City Council to a final decision. Equally they do not bind the Head of Planning services to a final recommendation nor override the requirement for the formal planning application to be determined with full impartiality in line with the statutory requirements of the act
- 8 The Head of Planning Services and his team will aim to act as facilitators to ensure that the City Council is taking a positive and proactive role in implementing the Development Plan
- 9 If however, at any time the Head of Planning Services becomes concerned that the professional advice being given is being consistently ignored, or is being misquoted, or mischievously misinterpreted, he will reserve the right to withdraw from the process of pre application guidance, and will maintain the role of regulator
- 10 It will also be the responsibility of the Head of Planning Services to identify to the developer the key interest groups and physical areas of neighbourhoods, with which community engagement will take place prior to the preparation of a planning application

This will enable the developer to create a terms of reference for the Statement of Community Involvement to be submitted with any subsequent application

- 11 As a general rule the developer will be expected to carry out the initial rounds of community engagement direct. This is intended to avoid the impression that the Local Planning Authority is promoting the scheme. The City Council will undertake separate direct consultation at subsequent stages either as part of the Formal Planning application stage or, if appropriate before the adoption of a development brief for the site, to establish the community's reaction to the process.
- 12 The Head of Planning Services and his team will be available at all times to interact with local community groups and other consultees to explain the process and provide clarification about the City Council's role as Local Planning Authority.
- 13 As part of the pre application process for major schemes in this category it will also be the City Council's practice to discuss potential planning conditions and heads of terms for any legal agreements under Section 106 of the act. To assist in the streamlining of the process it will be appropriate in some cases for joint instructions to be given to an external and independent prepare a draft legal agreement to secure the aims and objectives of both parties.
- 14 Prior to the submission of a formal planning application, a project delivery plan will be agreed between the Head of Planning Services and the lead developer. This will include expected timetables for community engagement, statutory consultees, final revisions negotiations, and anticipated Committee dates. The programme will also include expected provisions for agreement of pre commencement conditions and subsequent conditions and development monitoring arrangements.

**CANAL CORRIDOR NORTH
LANCASTER**

**PLANNING DELIVERY AGREEMENT FOR CANAL CORRIDOR NORTH
BETWEEN LANCASTER CITY COUNCIL AND CENTROS MILLER**

PLANNING DELIVERY AGREEMENT PROTOCOL

1. Vision and Objectives

1.1 Vision

To fulfil the provisions of the Development Brief adopted September 2004 by the development of a high quality retail led mixed use extension to the existing City Centre which enables the commercial potential of Lancaster to be fulfilled, fully integrates with the existing City Centre, reinforces its cultural importance and regenerates this run down and inefficiently used area of land

1.2 Objectives

To work together to an agreed set of goals to deliver a high quality viable scheme, from masterplanning through to completion as set out below

- Masterplanning Process (Undertaken November 2005 to June 2006)
- Pre Application Preparation
- Application Submission to Lancaster City Council Resolution
- Post Resolution - S106/S278/Road Closure Orders
- Compulsory Purchase
- Reserved Matters and Discharge of Conditions

In order to deliver the scheme through these phases, both Centros Miller and Lancaster City Council (LCC) will produce a joint project plan and programme to address each of the above stages to clearly set out tasks and goals. The Masterplan Process has already been undertaken and programme produced

2. Procedural Arrangements - Project Team & Commitment

Developers Team

- Project Champion - David Lewis - Centros Miller
- Project Team Key principals -
 - └ Julian Stephenson - Montagu Evans
 - └ Mark Anders - Reid Architecture
 - └ Paul Stocker - Mayer Brown
 - └ Steve Bryson - Halogen
 - └ Simon Handy - Waterman Environmental

Lancaster City Council

- Project Champion - Andrew Dobson - Head of Planning and Building Control Service
- Project Team -
 - └ Mark Cassidy - Senior Planning Officer
 - └ David Lawson - Forward Planning Manager
 - └ Stephen Gardner - Senior Conservation Officer
 - └ Clive Holt - Lancaster County Council Highways
 - └ Neil Stevens - Lancaster County Council Highways

Both Teams commit to regular topic related workshop meetings throughout each stage as set out in section 1

CANAL CORRIDOR NORTH LANCASTER

3. Review of Policy Position

- 3.1 Policy EC8 of the North West Regional Spatial Strategy 2003 recognises the need to protect, sustain and improve town and city centres in the region. Lancaster is the primary centre for the district and a wider part of the Morecambe Bay area.
- 3.2 Policies RDF1 and RDF2 of the Draft Regional Spatial Strategy for the North West 2006 supports the enhancement of regional towns and cities in Cumbria and North Lancashire to support a balance of strong and distinctive urban centres. Lancaster will also be seen as a key service centre for surrounding villages and rural areas.
- 3.3 Policy CNL4 seeks to provide new development in Lancaster that enhances and is integrated with its historic character. Modifications will be proposed to this policy to strengthen the link with RDF2 recognising the city renaissance role for Lancaster to help aid the regeneration and sustainability of the South Cumbria and North Lancashire sub regional area.
- 3.4 Policy 2 of the Joint Lancashire Structure Plan 2001-2016 identifies Lancaster /Morecambe as a main development location.
- 3.5 Policy S1 of the Lancaster District Local Plan 1996-2006 identifies Lancaster as a sub-regional centre.
- 3.6 Supplementary Planning Guidance Note 8 of the Lancaster District Local Plan identifies the site as the Canal Corridor North and is the Development Brief for the site. The brief sets out that the site should be developed for mixed uses including appropriate levels of retailing, and enhancement to the cultural quarter and a significant element of residential.

4. Review of Evidence Base

4.1 Existing Evidence Base

- The development brief (SPG 8) provides the framework for bringing forward development of the site
- Existing Local Plan Policy
- Emerging Local Development Framework
- WYG retail report commissioned by LCC and subsequent review by Montagu Evans
- SPG 16 - housing
- Emerging RSS
- Centros Miller city centre survey results
- Centros Miller postal survey results
- Stakeholder and public consultation responses
- Mayer Brown Lancaster City Centre Parking Study and Traffic Study
- PARAMICS Model

4.2 Further Work Required

- | | |
|--|--------------------------|
| • Agreement of applications format | - Montagu Evans |
| • Traffic Impact Assessment to be informed by PARAMICS Model | - Mayer Brown |
| • Retail Impact Assessment | - Montagu Evans |
| • Environmental Impact Assessment following screening and scoping opinion from LCC | -Watermans/Montagu Evans |
| • Contamination survey/site remediation | -TBA |
| • Archaeological desk top study | - TBA |
| • Foul and surface water disposal strategy | - TBA |

CANAL CORRIDOR NORTH LANCASTER

- | | |
|---|---------------------------------------|
| • Rights to light/sunlight and daylight studies | - TBA |
| • Townscape Assessment | - Reid Architecture/
Watermans/TBA |
| • Scheme Design | - Reid Architecture |
| • Bridge link into site | - Reid Architecture |
| • Affordable Housing strategy | - Montagu Evans |
| • Parking strategy | - Mayer Brown |
| • S106 Issues | - Centros Miller/Montagu
Evans |
| • Statutory Consultations | - Centros Miller Team |
| • Public Consultations | - Halogen |

This list is not intended to be complete - it is envisaged that further tasks may be added as application preparation progresses

5. Community Engagement Strategy

5.1 Widespread public consultation was carried out on the development brief and taken into account prior to its adoption in September 2004

5.2 As part of the masterplanning process LCC and Centros Miller have identified the key groups to be consulted as follows

Stakeholders

- The Grand Theatre
- The Dukes Theatre
- The Musicians Co-op
- Site Stakeholders

Local Interest Groups

- Local Residents (represented by It's our City and Real Planning for Lancaster)
- Lancaster Chamber of Commerce
- Lancaster Civic Society

5.3 Centros Miller has undertaken 3 rounds of consultation between November 2005 and June 2006 as part of the masterplanning process as follows

Stage 1 - December 2005

- Individual meetings held with each of the stakeholders and Local interest groups as set out above to obtain an understanding of their views
- A City centre survey was undertaken 19 - 21 January 2006
- Postal surveys were undertaken in January and February 2006

Stage 2 - February 2006

- Individual meetings were held as in stage 1 with the initial masterplan concept revealed for discussion and feedback

Stage 3 - May 2006

- Refined masterplan revealed at a series of public meetings for feedback and discussion

5.4 The consultation work undertaken and responses, will be summarised in a document produced by Halogen and will be submitted as part of the masterplan report

CANAL CORRIDOR NORTH LANCASTER

- 5 5 Consultation work will continue throughout the application preparation process with public exhibition proposed. A detailed Statement of Community Involvement will be submitted in support of the planning application setting out all the consultation work undertaken up to that point, and which will be in accordance with the Council's Statement of Community Involvement

6. Member Involvement

- 6 1 To inform Lancaster City Council Members of the process being undertaken and progress made, Centros Miller, following discussion with LCC, invited Members to briefing sessions at all 3 of the consultation stages. These briefings allowed Centros Miller to update Members on progress and present them with the same information as presented to the Stakeholders and Public. It also gave Members the chance to ask any questions
- 6 2 The intention of these briefings was to inform Members and provide an opportunity for questions to be asked without seeking any views or opinions or compromising their decision making responsibilities
- 6 3 Where members have strong views they would be encouraged to discuss this with their own officers and not to enter into negotiations direct with the developer

7. Statutory Agency Involvement

- 7 1 Centros Miller and Lancaster City Council have worked together to identify the key statutory consultees. These are identified as
- Lancashire County Council Highways
 - English Heritage
 - The Commission for Architecture and the Built Environment (CABE)
 - The Government Office for the North West (GONW)
 - British Waterways
- 7 2 Lancaster County Highways have been involved with the masterplanning process over the last 6 months and are working closely with Mayer Brown on highways matters. They will continue to be involved in the pre application workshops
- 7 3 A representative British Waterways has attended one of the workshop meetings and will continue to be informed of upcoming meetings
- 7 4 Centros Miller proposes to meet with EH, CABE and GONW as soon as possible and are in the process of arranging meetings with these bodies to gain initial feedback on the masterplan. They will be consulted again as application preparation progresses

8. Planning Process Review

- 8 1 The policy framework is in place as set out above. This has informed the masterplan process that has been undertaken by Centros Miller since November 2005 to June 2006 in conjunction with LCC
- 8 2 The masterplanning stage was completed in June 2006, with a report to be submitted to LCC by Centros Miller by mid July concluding and drawing out principles agreed, with a view to agreement by the LCC through its cabinet meeting to discuss the Development Agreement for the site
- 8 3 Following Cabinet approval of the Development Agreement, pre application work will begin. The first project plan and programme has been produced to cover this period

CANAL CORRIDOR NORTH LANCASTER

8.4 Further project plans will be drawn up between LCC and Centros Miller to address the later stages as outlined in section 1 above

9. Section 106 Methodology

- 9.1 Appoint legal specialists with both party's instructions and requirements clearly identified
- 9.2 Heads of terms will be the subject of a dedicated workshop session as matters progress and once the planning application has been worked up in more detail. Until the proposal progresses it is difficult to pinpoint what heads of terms might be however it is anticipated that broad issues may include Highways/Transportation matters, and phasing of infrastructure

10. Resources

- 10.1 The City Council's Planning Services have enjoyed significant re investment in recent years by the use of Planning Delivery Grant. This has meant that there are adequate resources and expertise available to undertake pre application negotiations. The application will be handled in the strategic applications team which concentrates on applications with corporate priority
- 10.2 Centros Miller has assembled a team from a number of top development consultancies to address the topic areas identified as material planning considerations. In addition to ensuring access to specific expertise is available, the company have also engaged a PR Consultant and Project Manager to cover community engagement and project delivery
- LCC has agreed to appoint WYG to audit the retail assessment to be produced as part of the planning application
 - LCC /Lancashire County Council to approve PARAMICS model
 - Lancashire County Council to review the submitted Transport Assessment
 - Lancaster City Council has the in house resources to address the ES scoping and screening together with external consultation to the relevant bodies. The same applies to assessment of the ES when submitted

11. Statement of Commitment

- 11.1 By way of this protocol, Centros Miller and Lancashire City Council agree to work together to bring forward the development of the Canal Corridor North Site from Masterplanning through to completion of the development as set out in section 1 above delivering the objectives of the Local Plan and Development Brief for the site
- 11.2 Both Centros Miller and Lancaster City Council commit to the development of a project plan and programme of work for the stages identified under section 1 above, and to work together to undertake the tasks as set out and deliver within these agreed time scales

12. Agree Project Review

- 12.1 The programme included as part of the project plan sets out the key milestones for the masterplanning phase (now complete) and pre application phase. Further project plans to be produced for the later stages will include further programmes and key milestones which will be identified and agreed

Appendix 5- Planning Delivery Agreement Protocol, Stockwell Park, Lambeth, London

PLANNING DELIVERY AGREEMENT PROTOCOL

KEY PROJECT ISSUES

1. Procedural arrangements for Project

- **Project Champion**

TASK: agreed the identity of a Project Champion for both parties. Agreed that this post would resolve issues that cannot be resolved by the Project Team and agree the final PDA

TASK: establish corporate buy in by the Council

- **Project Team - composition**

TASK: Resolve following questions

- Are correct people on project team – identify core members and additional transitory members (to include GLA input, sustainability colleagues, secure by design colleagues, TfL input)
- Do we need all project team members at each meeting – no but ensure project team are briefed of supplementary meetings

- **Need for a Steering Group** – agreed that this tier is not necessary for this project

2. Review of Policy Position

- Policy framework scoped by applicant and given to Council
- UDP reviewed – issues raised
 - level of private housing and proportion/definition of affordable housing to meet planning policy. Also Network need to deliver a certain number of homes
 - London Plan – GLA referral
- Policy gaps
 - **TASK:** Education policy contributions – how to calculate contributions needs to be agreed
 - Status of Planning and Urban Design Framework – unsubstantiated design tool

3. Review of Evidence Base

Task	Responsible party
Education – contributions	<ul style="list-style-type: none">▪ Applicant to provide predicted number of children▪ LBL to respond with cost provision
Transport – traffic information and car club, public transport	Applicant and LBL
Sunlight and Daylight studies	Applicant

Open book agreed (if necessary)	Applicant
Open space information – need to assess information provided by agents	LBL
Health impact of proposal	Applicant to approach PCT
Sustainable information – engagement, community floorspace and retail space	Applicant and LBL
Financial information to justify shortfall in affordable housing	Applicant

4. Community Engagement Strategy

Considerable engagement already carried out with estate residents

Issues still to resolve

- 'political' view/position, especially ward members
- Lack of consultation outside the estate – note a public exhibition at the local housing office on March 3rd

Meeting discussed and agreed several steps for engagement

- Specific consultation letter on planning application to be tailored to the relevant residents, ie estate and non-estate residents, explaining which part of the process they are contributing to.
- LBL to prepare consultation documents and applicant to despatch direct to consultees, together with relevant plans and documents.
- Control of process – LBL to lead during application and will decide who/how to consult and will discuss with applicant. Discussed possibility of a leaflet with the application site defined and some factual details about the scheme
- **TASK:** LBL to define area for consultation

5. Agree Member involvement

- Brixton Area Committee engagement – LBL to brief members of Area Committee after elections
- Planning Committee members – as above
- Ward Members – as above

TASK: LBL to identify method of engagement after local elections

6. Statutory Agency input

Relevant agencies are English Heritage, GLA, TfL, GOL, PCT

TASK: LBL to consider strategy for engaging with these agencies

7. **Planning Process review** – meeting agreed to follow procedure on page 6 of PDA Guidance note

8. Resources

LBL – manageable with in-house resources. Possible concerns relating to access to Highways officers.

9. Establish shared commitment

The following vision and objectives for the finalised scheme were discussed

'To create a safe, attractive, cohesive and sustainable neighbourhood that relates well with its surrounding'

The details behind this statement relate to

- Connection with the surroundings
- Enhancement
- Integration
- Community centre/costs
- More integration
- Quality of housing and environment

Some issues emerged regarding issues of permeability versus non-permeability – Network Housing and the Trust are reflecting what people living on the Estates most want i.e. a safe, attractive and cohesive area, while the Council is placing greater emphasis at the wider issue of permeability and connectivity. However this may not match residents' aspirations. Need to balance residents' wishes and Council's aspirations.

TASK: LBL to review objectives in design statement and LBL and Applicant to refine vision

PROJECT PLAN AND PROGRAMME

1. Establish vision and objectives

This was discussed in item 9 on page 4.

2. Key Issues: identifying and agreeing technical tasks as at March 2nd (completed on May 11th)

Issue	Responsibility	Status – resolved, partially resolved, not resolved
Land acquisition/CPO	LBL/Applicant	Need to develop separate joint strategy for dealing with this to avoid delay to the application
Road Closure	LBL	Resolved
Issues relating to Housing tenure/mix/size/density issues (to include financial statement)	Applicant	Fixed mix and tenure split. Commitment given to open book process. LBL Planning and Housing Depts to liaise re acceptability
Building height (daylight and sunlight)	Applicant	Ongoing. Planning requirements clarified. Formal survey underway
Building height (SE corner and northern edge)	Applicant	South East corner – proposed massing agreed North boundary – to be further assessed post submission
S106 and education contribution	LBL/Applicant	Emerging standards received by applicants. Under discussion
Transport Assessment, including traffic generation and car parking	Applicant	Established standards and provision to comply with UDP. Subsequent meeting scheduled to agree information required for formal submission
Open Space Impact – form of open space and net loss of public open space	Applicant	Agreed as a departure – will be addressed as part of formal submission
Urban Design approach <ul style="list-style-type: none"> • Public realm • Permeability • Connections • Crime/security 	Applicant	Principles have been discussed – applicant to present and explain as part of submission
Community facilities	Applicant	Applicant approached PCT – issues to be resolved
Level of information needed to support application <ul style="list-style-type: none"> • technical information • drawings etc 	Applicant/LBL	Resolved

• what's for approval		
Sustainable construction/energy requirements	Applicant	Applicant needs to meet with Jon Lissimore. Need to submit sustainability statement with application
Retail and commercial floorspace in SW corner	Applicant	Resolved
Affordable housing – current proposal	LBL	LBL to give view on submission so far. Applicant to provide financial information to support proposal

Note: The following items were agreed on May 11th

3. Assessment and decision making process

A series of regular meetings has been agreed for the duration of the pre and post submission process with attendance decided in accordance with issues arising.

4. Community Engagement Strategy

Issues and actions set on in item 4 on page 4

5. Complete the programme of work based on the tasks identified above

An Action Plan was produced dated March 16th by the applicant detailing the pre and post submission work programme. This will be updated and more detail added after the formal application is submitted.

**PDA ACTION PLAN & PROGRAMME
STOCKWELL PARK AND ROBSART ESTATES
- POST APPLICATION -**

HEPHER DIXON
PLANNING AND REGENERATION

WORK PLAN	TO BE ACTIONED BY	29-May-06	05-Jun-06	12-Jun-06	19-Jun-06	26-Jun-06	03-Jul-06	10-Jul-06	17-Jul-06	24-Jul-06	31-Jul-06	07-Aug-06	14-Aug-06	21-Aug-06	28-Aug-06	04-Sep-06	11-Sep-06	18-Sep-06
1 PDA Team Meetings (To be Agreed)	PDA Team										3rd		17th					
2 Planning Application Validated (02-02-06)	Lambeth																	
3 Statutory Consultation (21 days)	Lambeth (with Developer help)																	
4 Lambeth internal meeting on Planning Obligations	Lambeth																	
5 Meeting with GLA	Developer & Lambeth					26th												
6 Identify issues arising from consultation and planning obligation issues from Lambeth (including Education)	Lambeth				22nd	28th												
7 Establish separate strategy for Stock Transfer and CPO report to Cabinet	Developer & Lambeth																	
8 Briefing of Ward Councillors	Developer & Lambeth																	
9 Heads of Terms for s106 Agreement (First, Second and Third Drafts)	Lambeth & Developer																	
10 Planning Conditions (First, Second and Third Drafts)	Lambeth & Developer																	
11 Window for any necessary clarification and/or revisions	Lambeth & Developer																	
12 Window for consultation on any necessary clarification and/or revisions	Lambeth																	
13 Finalisation of report to Cabinet	Lambeth																	
14 Cabinet Meeting (16-10-06)	Lambeth																	

Post Application (20 06 2006) xls
03/08/2006